

Fill in this information to identify your case:

United States Bankruptcy Court for the:

DISTRICT OF NEW JERSEY

Case number (if known) Chapter 11

☐ Check if this an amended filing

Official Form 201

Voluntary Petition for Non-Individuals Filing for Bankruptcy

06/22

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name International Claims Services, Inc.

2. All other names debtor used in the last 8 years

Include any assumed names, trade names and doing business as names

3. Debtor's federal Employer Identification Number (EIN) 98-0076650

4. Debtor's address Principal place of business Mailing address, if different from principal place of business

c/o Global Benefits Group, Inc.
902 Carnegie Center Drive
Suite 100
Princeton, NJ 08540
Number, Street, City, State & ZIP Code

Mercer
County

P.O. Box, Number, Street, City, State & ZIP Code

Location of principal assets, if different from principal place of business

Number, Street, City, State & ZIP Code

5. Debtor's website (URL) www.gbg.com

6. Type of debtor ☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))
☐ Partnership (excluding LLP)
☐ Other. Specify:

Debtor International Claims Services, Inc. Case number (if known) _____
Name

7. Describe debtor's business

A. *Check one:*

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
☐ Railroad (as defined in 11 U.S.C. § 101(44))
☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
☒ None of the above

B. *Check all that apply*

- ☐ Tax-exempt entity (as described in 26 U.S.C. §501)
☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. §80a-3)
☐ Investment advisor (as defined in 15 U.S.C. §80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

8. Under which chapter of the Bankruptcy Code is the debtor filing?

Check one:

- ☐ Chapter 7
☐ Chapter 9

☒ Chapter 11. *Check all that apply:*

- ☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$3,024,725. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
☒ The debtor is a debtor as defined in 11 U.S.C. § 1182(1), its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$7,500,000, **and it chooses to proceed under Subchapter V of Chapter 11**. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return, or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
☐ A plan is being filed with this petition.
☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12

9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?

- ☒ No.
☐ Yes.

If more than 2 cases, attach a separate list.

District _____	When _____	Case number _____
District _____	When _____	Case number _____

Name

☐ No
☒ Yes.

Debtor District	See Attachment When	Relationship Case number, if known
--------------------	------------------------	---------------------------------------

☐ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.

☒ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

Phone

☐ \$500,000,001 - \$1 billion

Debtor International Claims Services, Inc. Case number (if known) _____
Name

☐ \$50,001 - \$100,000
☐ \$100,001 - \$500,000
☐ \$500,001 - \$1 million

☐ \$10,000,001 - \$50 million
☐ \$50,000,001 - \$100 million
☐ \$100,000,001 - \$500 million

☐ \$1,000,000,001 - \$10 billion
☐ \$10,000,000,001 - \$50 billion
☐ More than \$50 billion

Debtor International Claims Services, Inc. Case number (if known) _____
Name

Request for Relief, Declaration, and Signatures

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

**17. Declaration and signature
of authorized
representative of debtor**

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 18, 2024
MM / DD / YYYY

X /s/ Howard Ehrlich
Signature of authorized representative of debtor

Title Authorized Officer

Howard Ehrlich
Printed name

18. Signature of attorney **X** /s/ S. Jason Teele
Signature of attorney for debtor

Date June 18, 2024
MM / DD / YYYY

S. Jason Teele 014012001
Printed name

Sills Cummis & Gross P.C.
Firm name

One Riverfront Plaza
Newark, NJ 07102
Number, Street, City, State & ZIP Code

Contact phone (973) 643-4779 Email address steele@sillscummis.com

014012001 NJ
Bar number and State

Debtor International Claims Services, Inc. Case number (if known) _____
Name

Fill in this information to identify your case:

United States Bankruptcy Court for the:

DISTRICT OF NEW JERSEY

Case number (if known) _____ Chapter 11

☐ Check if this an amended filing

FORM 201. VOLUNTARY PETITION

Pending Bankruptcy Cases Attachment

Debtor	<u>GBG Holding Incorporated</u>	Relationship to you	_____
District	<u>D.N.J.</u>	When	_____
Case number, if known	_____		
Debtor	<u>Global Benefits Group, Inc.</u>	Relationship to you	_____
District	<u>D.N.J.</u>	When	_____
Case number, if known	_____		

**WRITTEN CONSENT IN LIEU OF MEETING OF THE BOARD OF DIRECTORS OF
INTERNATIONAL CLAIMS SERVICES, INC.**

The undersigned, being all of the directors of the Board of Directors (the “Board”) of International Claims Services, Inc., a Delaware corporation (the “Corporation” hereby consents to the following actions and adopts the following resolutions as of June 13, 2024:

WHEREAS, the Company, operating in conjunction with its affiliates and subsidiaries, is a leading global insurance service company servicing health, life, disability, and travel insurance for a client base that spans multinational corporations, expatriates, international students, high net-worth individuals, international schools, and non-profit organizations;

WHEREAS, the Board has reviewed and considered the liabilities and liquidity of the Company, the strategic alternatives available to it, the valuation of the Company and its affiliates, and the impact of the foregoing on the Company’s business;

WHEREAS, the Board has had the opportunity to consult with the management and the financial and legal advisors to the Company and fully consider each of the strategic alternatives available to the Company; and

WHEREAS, the Board deems it advisable and in the best interest of the Company and its creditors, interest holders, and other parties in interest, to consent to and adopt, in the name and on behalf of the Company, the resolutions set forth below.

NOW, THEREFORE, BE IT:

RESOLVED, that Howard Ehrlich and any officers of the Company so designated by Howard Ehrlich, acting alone or with one or more other officers of the Company (individually, each an “Authorized Officer” and collectively, the “Authorized Officers”), are hereby authorized and empowered, in the name and on behalf of the Company, with the assistance of the Company’s counsel, accountants and advisers, to (i) prepare, execute and file with the appropriate court a petition under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”); and (ii) take such other and further actions and steps as the Authorized Officers may deem necessary, appropriate or advisable to obtain for the Company any and all relief to which they are or may be entitled under chapter 11 of the Bankruptcy Code; and be it further

RESOLVED, that the Authorized Officers are, and any one of them acting alone is, hereby authorized to execute and file on behalf of the Company all petitions, schedules, lists, and other motions, papers, or documents, and to take any and all actions that they deem necessary or proper to obtain relief under the Bankruptcy Code, including, without limitation, any action necessary to maintain the ordinary course operation of the Company’s business; and be it further

RESOLVED, that the Authorized Officers are, and any one of them acting alone is, hereby authorized and directed to retain and employ, in the name and on behalf of the Company, the law firm of Sills Cummis & Gross P.C. as legal counsel to the Company, to represent and

assist the Company in carrying out its duties under the Bankruptcy Code and to take any and all actions to advance the Company's rights under the Bankruptcy Code or otherwise; and in connection therewith, the Authorized Officers, with power of delegation, are hereby authorized and directed to execute appropriate retention agreements, pay appropriate retainers, and to cause to be filed an appropriate application for authority to retain the services of Sills Cummis & Gross P.C.; and be it further

RESOLVED, that the Authorized Officers are, and any one of them acting alone is, hereby authorized and directed to employ, in the name and on behalf of the Company, and Getzler Henrich & Associates LLC as financial advisor to the Company, to represent and assist the Company in carrying out its duties under the Bankruptcy Code and to take any and all actions to advance the Company's rights; and in connection therewith, the Authorized Officers, with power of delegation, are hereby authorized and directed to execute appropriate retention agreements, pay appropriate retainers, and to cause to be filed appropriate applications for authority to retain the services of and Getzler Henrich & Associates LLC; and be it further

RESOLVED, that the Authorized Officers are, and any one of them acting alone is, hereby authorized and directed to employ, in the name and on behalf of the Company, Omni Agent Solutions to provide claims, noticing, balloting and case administration services to the Company, to represent and assist the Company in carrying out its duties under the Bankruptcy Code and to take any and all actions to advance the Company's rights; and in connection therewith, the Authorized Officers, with power of delegation, are hereby authorized and directed to execute appropriate retention agreements, pay appropriate retainers, and to cause to be filed appropriate applications for authority to retain the services of Omni Agent Solutions; and be it further

RESOLVED, that the Authorized Officers are, and any one of them acting alone is, hereby authorized and empowered to employ, in the name and on behalf of the Company, any other professionals to represent and assist the Company in carrying out its duties under the Bankruptcy Code; and in connection therewith, the Authorized Officers, with power of delegation, are hereby authorized and directed to execute appropriate retention agreements, pay appropriate retainers, and to cause to be filed an appropriate application for authority to retain the services of any other professionals as necessary; and be it further

RESOLVED, that in connection with the Chapter 11 Case, the Authorized Officers are, and any one of them acting alone is, hereby authorized and empowered to execute agreements or other documents establishing procedures for the sale of some, all or substantially all assets of the Company pursuant to Section 363 of the Bankruptcy Code or any other equity or asset sale, subject to the approval of such procedures by the Bankruptcy Court in the Chapter 11 Case (the "**Sale Procedures**"), on such terms and conditions as are deemed necessary or advisable by any Authorized Officer executing the same, the execution thereof by such officer to be conclusive evidence of such approval and determination; and be it further

RESOLVED, that the Authorized Officers are, and any one of them acting alone is, hereby authorized and empowered to execute, deliver and perform any agreement, document or any amendment to the foregoing, in the name and on behalf of the Company, in connection with

any transaction for the sale of all or substantially all assets of the Company, on such terms as the Authorized Officers deem necessary or advisable in order to carry out the purpose and intent of the foregoing resolutions; and be it further

RESOLVED, that the Authorized Officers are, and any one of them acting alone is, hereby authorized, empowered and directed, in the name and on behalf of the Company, to take such additional actions, to perform all acts and deeds, and to execute, ratify, certify, deliver, file and record such additional agreements, notices, certificates, instruments, applications, payments, letters and documents as any of them may deem necessary or appropriate to implement the provisions of the foregoing resolutions, and to appoint such agents on behalf of the Company as such Authorized Offices, and any of them, may deem necessary or appropriate in connection with the Sale Procedures, and the transactions contemplated by any of the foregoing, the authority for the taking of such action to be conclusive evidence thereof, and be it further

RESOLVED, that any and all past actions heretofore taken by any Authorized Officer in the name and on behalf of the Company in furtherance of any or all of the foregoing resolutions be, and the same hereby are, ratified, confirmed and approved in all respects; and be it further

RESOLVED, that this written consent may be executed (a) in any number of counterparts, each of which shall be an original, but all of which together shall constitute one and the same written consent, notwithstanding that the undersigned are not signatories to the original or to the same counterpart and (b) via (i) facsimile transmission or (ii) other electronic transmission which provides an accurate copy of this written consent (collectively, the “**Electronic Copy**”), which such Electronic Copy shall be deemed an original.

IN WITNESS WHEREOF, the undersigned has duly executed and delivered this Written Consent as of the date first written above.

PAOLA MERLO

/s/ Paola Merlo

KENNETH A. ROSEN

/s/ Kenneth A. Rosen

Fill in this information to identify the case:

Debtor name International Claims Services, Inc.

United States Bankruptcy Court for the: DISTRICT OF NEW JERSEY

Case number (if known) _____

☐ Check if this is an amended filing

Official Form 202

Declaration Under Penalty of Perjury for Non-Individual Debtors

12/15

An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Declaration and signature

I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership; or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

- ☐ *Schedule A/B: Assets—Real and Personal Property* (Official Form 206A/B)
- ☐ *Schedule D: Creditors Who Have Claims Secured by Property* (Official Form 206D)
- ☐ *Schedule E/F: Creditors Who Have Unsecured Claims* (Official Form 206E/F)
- ☐ *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G)
- ☐ *Schedule H: Codebtors* (Official Form 206H)
- ☐ *Summary of Assets and Liabilities for Non-Individuals* (Official Form 206Sum)
- ☐ *Amended Schedule*
- ☒ *Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders* (Official Form 204)
- ☒ Other document that requires a declaration List of Equity Security Holders

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 18, 2024

☒ /s/ Howard Ehrlich

Signature of individual signing on behalf of debtor

Howard Ehrlich

Printed name

Authorized Officer

Position or relationship to debtor

Fill in this information to identify the case:

Debtor name International Claims Services, Inc.
United States Bankruptcy Court for the: DISTRICT OF NEW JERSEY
Case number (if known): _____

☐ Check if this is an
amended filing

Official Form 204

Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders 12/15

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an insider, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
-NONE-						

B2030 (Form 2030) (12/15)

**United States Bankruptcy Court
District of New Jersey**

In re **International Claims Services, Inc.**

Debtor(s)

Case No.

Chapter

11

DISCLOSURE OF COMPENSATION OF ATTORNEY FOR DEBTOR(S)

1. Pursuant to 11 U.S.C. § 329(a) and Fed. Bankr. P. 2016(b), I certify that I am the attorney for the above named debtor(s) and that compensation paid to me within one year before the filing of the petition in bankruptcy, or agreed to be paid to me, for services rendered or to be rendered on behalf of the debtor(s) in contemplation of or in connection with the bankruptcy case is as follows:
- | | | |
|---|----|--|
| For legal services, I have agreed to accept | \$ | Hourly Rates |
| Prior to the filing of this statement I have received | \$ | \$650,000 |
| Balance Due | \$ | Fees & Expenses as awarded by the Court |
2. The source of the compensation paid to me was:
- ☒ Debtor ☐ Other (specify):
3. The source of compensation to be paid to me is:
- ☒ Debtor ☐ Other (specify):
4. ☒ I have not agreed to share the above-disclosed compensation with any other person unless they are members and associates of my law firm.
- ☐ I have agreed to share the above-disclosed compensation with a person or persons who are not members or associates of my law firm. A copy of the agreement, together with a list of the names of the people sharing in the compensation is attached.
5. In return for the above-disclosed fee, I have agreed to render legal service for all aspects of the bankruptcy case, including:
- Analysis of the debtor's financial situation, and rendering advice to the debtor in determining whether to file a petition in bankruptcy;
 - Preparation and filing of any petition, schedules, statement of affairs and plan which may be required;
 - Representation of the debtor at the meeting of creditors and confirmation hearing, and any adjourned hearings thereof;
 - Representation of the debtor in adversary proceedings and other contested bankruptcy matters;
 - [Other provisions as needed]
6. By agreement with the debtor(s), the above-disclosed fee does not include the following service:

CERTIFICATION

I certify that the foregoing is a complete statement of any agreement or arrangement for payment to me for representation of the debtor(s) in this bankruptcy proceeding.

June 18, 2024

Date

/s/ S. Jason Teele

S. Jason Teele 014012001

Signature of Attorney

Sills Cummis & Gross P.C.

One Riverfront Plaza

Newark, NJ 07102

(973) 643-4779

steale@sillscummis.com

Name of law firm

**United States Bankruptcy Court
District of New Jersey**

In re International Claims Services, Inc.

Debtor(s)

Case No.

Chapter 11

LIST OF EQUITY SECURITY HOLDERS

Following is the list of the Debtor's equity security holders which is prepared in accordance with rule 1007(a)(3) for filing in this Chapter 11 Case

Name and last known address or place of business of holder	Security Class	Number of Securities	Kind of Interest
Global Benefits Group, Inc. 902 Carnegie Center Drive Suite 100 Princeton, NJ 08540			100%

DECLARATION UNDER PENALTY OF PERJURY ON BEHALF OF CORPORATION OR PARTNERSHIP

I, the Authorized Officer of the corporation named as the debtor in this case, declare under penalty of perjury that I have read the foregoing List of Equity Security Holders and that it is true and correct to the best of my information and belief.

Date June 18, 2024

Signature /s/ Howard Ehrlich
Howard Ehrlich

*Penalty for making a false statement of concealing property: Fine of up to \$500,000 or imprisonment for up to 5 years or both.
18 U.S.C. §§ 152 and 3571.*

District of New Jersey

International Claims Services, Inc.

Debtor(s)

Case No.

Chapter

11

VERIFICATION OF CREDITOR MATRIX

correct to the best of my knowledge.

June 18, 2024

/s/ Howard Ehrlich

Howard Ehrlich/Authorized Officer

Signer/Title

Bank of America Legal Department
100 North Tryon Street
Charlotte, NC 28255

CA Department of Tax and Fee Admin
P.O. Box 942879
Sacramento, CA 94279-0029

Cigna Group
900 Cottage Grove Road
Bloomfield, CT 06002

Colorado Attorney General
1300 Broadway, 10th Fl
Denver, CO 80203

Colorado Department of Revenue
Bankruptcy Unit
PO Box 17087
Denver, CO 80217

District of Columbia Attorney General
400 6th St, NW
Washington, DC 20001

District of Columbia Office of Tax & Rev
1100 4th St, SW
Suite E200
Washington, DC 20024

FL Department of Revenue
PO Box 6668
Tallahassee, FL 32316-6668

FL Office of the Attorney General
PL-01, The Capitol
Tallahassee, FL 32399-1050

GBG Insurance Limited
Albert House
South Esplanade
St Peter Port
Guernsey GY1 1AW

Illinois Attorney General
500 South Second St
Springfield, IL 62701

Illinois Department of Revenue
Bankruptcy Unit
PO Box 19035
Springfield, IL 62794

Internal Revenue Service
PO Box 7317
Philadelphia, PA 19101-7317

Metropolitan Life Insurance Company
200 Park Avenue
New York, NY 10166

Nebraska Attorney General
2115 State Capitol
PO Box 98920
Lincoln, NE 68509

Nebraska Department of Revenue
PO Box 98912
Lincoln, NE 68509

New York Life
51 Madison Avenue
New York, NY 10010

NJ Division of Taxation
Revenue Processing Center
Trenton, NJ 08646

North Carolina Attorney General
9001 Mail Service Center
Raleigh, NC 27699

North Carolina Department of Revenue
PO Box 871
Raleigh, NC 27602

NY Attorney General
28 Liberty Street
New York, NY 10005

NYS Department of Taxation
BUILDING 9
W A HARRIMAN CAMPUS
Albany, NY 12227

Office of the Attorney General - CA
Consumer Protection Section
Attn: Bankruptcy Notices
455 Golden Gate Ave., Suite 11000
San Francisco, CA 94102-7004

Office of the Attorney General - NJ
RJ Hughes Justice Complex
25 Market Street, Box 080
Trenton, NJ 08625

Office of the Attorney General - US
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530

Paylocity
1400 American Lane
Schaumburg, IL 60173

Standard Insurance Company
1100 Southwest 6th Avenue
Portland, OR 97204

U.S. Bancorp Center
Attn: Legal Department
800 Nicollet Mall
Minneapolis, MN 55402

United States Attorney - District of NJ
Peter W. Rodino, Jr. Federal Building
970 Broad St, 7th Fl.
Newark, NJ 07102

United States Trustee
One Newark Center
1085 Raymond Blvd., Suite 2100
Newark, NJ 07102

West Virginia Attorney General
State Capitol Complex
Building 1m Room E-26
1900 Kanawha Blvd. E
Charleston, WV 25305

West Virginia Tax Division
PO Box 1005
Charleston, WV 25324

**United States Bankruptcy Court
District of New Jersey**

In re International Claims Services, Inc.

Debtor(s)

Case No.

Chapter 11

CORPORATE OWNERSHIP STATEMENT (RULE 7007.1)

Pursuant to Federal Rule of Bankruptcy Procedure 7007.1 and to enable the Judges to evaluate possible disqualification or recusal, the undersigned counsel for International Claims Services, Inc. in the above captioned action, certifies that the following is a (are) corporation(s), other than the debtor or a governmental unit, that directly or indirectly own(s) 10% or more of any class of the corporation's(s') equity interests, or states that there are no entities to report under FRBP 7007.1:

Global Benefits Group, Inc.
902 Carnegie Center Drive
Suite 100
Princeton, NJ 08540

☐ None [*Check if applicable*]

June 18, 2024

Date

/s/ S. Jason Teele

S. Jason Teele 014012001

Signature of Attorney or Litigant

Counsel for International Claims Services, Inc.

Sills Cummis & Gross P.C.

One Riverfront Plaza

Newark, NJ 07102

(973) 643-4779

steele@sillscummis.com



October 20, 2023

Melissa Santanello,
Chief Financial Officer
Global Benefits Group Inc.
902 Carnegie Center, Suite 100
Princeton, NJ 08540

Dear Ms. Santanello,

PwC US Tax LLP ("we" or "us" or "PwC") has prepared the U.S. Corporation Income Tax Returns Form 1120 and the U.S. Income Tax Return of a Foreign Corporation, Form 1120-F for Global Benefits Group Inc. ("you" or "Client") for the tax year beginning January 1, 2022 through December 31, 2022. We are providing the returns pursuant to the engagement letter dated May 24, 2023.

Filing Instructions

Enclosed with this letter is a Form 8879-CORP, IRS E-file Signature Authorization for Form 1120 and Form 1120-F, signed by PwC as preparer and electronic return originator ("ERO"). As ERO, PwC has e-filed your December 31, 2022 Federal income tax return to the IRS.

The individual signing these returns is ultimately responsible for the correctness of the returns. Please retain a copy of the returns for your records. There may be significant penalties and interest imposed by the IRS for the late or incomplete filing of the returns.

Caveats & Limitations

Your tax return was prepared from books, records, and schedules provided by you without independent verification by PwC and are based upon the representations, documents, facts, and assumptions that have been provided by you with the assumption that such information is accurate, true, and authentic.

As you are aware, for federal income tax purposes, IRC Section 6662(e) and the related regulations impose penalties in cases of substantial tax understatements attributable to transfer pricing adjustments. In accordance with the regulations, the penalties are equal to 20% or 40% of the additional tax assessed, depending upon the level of understatement. If the IRS determines that the tax reported on the return examined is understated, then penalties will be assessed unless a taxpayer has reasonable cause for the understatement and acted in good faith in establishing its intercompany transfer prices. The IRS has indicated that contemporaneous documentation is a relevant factor in determining whether the taxpayer has acted with reasonable cause and in good faith, particularly for transactions after April 21, 1993. As such, contemporaneous documentation is needed in order to avoid exposure to these penalties - as specified in the regulations under IRC Section 6662(e) - in connection with any tax return filed that includes transactions covered by these regulations. The regulations require that such contemporaneous documentation be in place at the time the return is filed and be made available to the IRS within 30 days of a request for such documentation in order to qualify for the exception to the penalties.



Global Benefits Group Inc.
October 20, 2023

The positions reached in these returns represent and are based upon our best judgment regarding the application of federal or state income tax laws arising under the Internal Revenue Code, judicial decisions, administrative regulations, published rulings and other tax authorities existing as of the date of these returns. The positions taken on the returns are not binding upon the IRS or the courts and there is no guarantee that the IRS will not successfully assert a contrary position. Furthermore, no assurance can be given that future legislative or administrative changes, on either a prospective or retroactive basis, would not adversely affect the accuracy of the conclusions stated herein. Matters concerning changes in the laws and regulations or its interpretation which may occur after delivery of the returns are outside the scope of our engagement.

* * * * *

If we may be of further assistance, or if you have any questions about this engagement, please discuss with Raheem Spivey at (917) 214-5650 or raheem.spivey@pwc.com.

Sincerely,

DocuSigned by:
Raheem Spivey
AAE7D95FBCF1481...

Raheem Spivey, Managing Director

Enclosures:

Exhibit I - Detail Listing of Returns



Global Benefits Group Inc.
October 20, 2023

Exhibit I - Global Benefits Group Inc.

Detail Listing of Returns Prepared

Entity Name	Jurisdiction	Return Form	E-File Form (if E-Filed)	Filing Method (E-File or Paper)	Mailing Address (if Paper Filed)	Return Due Date	Amount Due (Refund Due)	Notes
GBG Insurance Limited	Federal	1120-F	8879-CORP	E-file	N/A	10/16/2023	NONE	N/A
GBG U.S. Group Holding Company and Sub	Federal	1120	8879-CORP	E-file	N/A	10/16/2023	NONE	N/A
GBGI Limited	Federal	1120-F	8879-CORP	E-file	N/A	10/16/2023	NONE	N/A
Global Benefits Group, Inc. and Sub	Federal	1120	8879-CORP	E-file	N/A	10/16/2023	NONE	N/A

Electronic Return Acknowledgement

Tax Year 2022

Return No 13049920232895009726

Taxpayer Global Benefits Group Inc and Subs/2022 Tax Compliance

EFIN 130499

Return Identification Number 13049920232895009726

Filing Type Description Federal Return

Tax Period Begin Date 01/01/2022

Tax Period End Date 12/31/2022

Return Status Accepted

Transmission Date and Timestamp 10/16/2023 03:32:06 PM

IRS Received Date 10/16/2023

Electronic Return Acknowledgement

Tax Year 2022

Return No 13049920231075002471

Taxpayer Global Benefits Group Inc and Subs/2022 Tax Compliance

EFIN 130499

Return Identification Number 13049920231075002471

Filing Type Description Federal Extension

Tax Period Begin Date 01/01/2022

Tax Period End Date 12/31/2022

Return Status Accepted

Transmission Date and Timestamp 04/17/2023 06:55:31 PM



Global Benefits Group Inc and Subs
Instructions for Filing
Form 8879-Corp
IRS e-file Signature Authorization for Form 1120
for the year ended December 31, 2022

The original form should be signed (using full name and title) and dated by an authorized officer of the corporation.

The signed form should be returned on or before October 16, 2023 to:

PwC US Tax LLP
300 MADISON AVENUE
NEW YORK, NY 10017

This return indicates a \$260,300 overpayment. Of this amount, \$0 will be refunded to you and \$260,300 has been applied to your 2023 estimated tax.

Do NOT separately file Form 1120 with the Internal Revenue Service. Doing so will delay the processing of your return.

We must receive your signed form before we can electronically transmit your return. The Internal Revenue Service will notify us when your return is accepted. Your return is not considered filed until the Internal Revenue Service confirms their acceptance.

Carryovers to Next Year
=====

Non-SRLY NOL	38,525,243.
--------------------	-------------

Form **8879-CORP****E-file Authorization for Corporations**

(December 2022)

For calendar year 2022, or tax year beginning _____, 2022, ending _____

Use for efile authorizations for Form 1120, 1120-F or 1120S.**Do not send to the IRS. Keep for your records.****Go to www.irs.gov/Form8879CORP for the latest information.**

OMB No. 1545-0123

Department of the Treasury
Internal Revenue Service

Name of corporation

Employer identification number

Global Benefits Group Inc and Subs20-3842750**Part I Information** (Whole dollars only)

1	Total income (Form 1120, line 11)	1	<u>88,191,803.</u>
2	Total income (Form 1120-F, Section II, line 11)	2	
3	Total income (loss) (Form 1120-S, line 6)	3	

Part II Declaration and Signature Authorization of Officer. Be sure to get a copy of the corporation's return.

Under penalties of perjury, I declare that I am an officer of the above corporation and that I have examined a copy of the corporation's electronic income tax return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and complete. I further declare that the amounts in Part I above are the amounts shown on the copy of the corporation's electronic income tax return. I consent to allow my electronic return originator (ERO), transmitter, or intermediate service provider to send the corporation's return to the IRS and to receive from the IRS (a) an acknowledgment of receipt or reason for rejection of the transmission, (b) the reason for any delay in processing the return or refund, and (c) the date of any refund. If applicable, I authorize the U.S. Treasury and its designated Financial Agent to initiate an electronic funds withdrawal (direct debit) entry to the financial institution account indicated in the tax preparation software for payment of the corporation's federal taxes owed on this return, and the financial institution to debit the entry to this account. To revoke a payment, I must contact the U.S. Treasury Financial Agent at **1-888-353-4537** no later than 2 business days prior to the payment (settlement) date. I also authorize the financial institutions involved in the processing of the electronic payment of taxes to receive confidential information necessary to answer inquiries and resolve issues related to the payment. I have selected a personal identification number (PIN) as my signature for the corporation's electronic income tax return and, if applicable, the corporation's consent to electronic funds withdrawal.

Officer's PIN: check one box only

☒ I authorize PwC US Tax LLP to enter my PIN 4 6 6 5 3 as my signature
ERO firm name do not enter all zeros
 on the corporation's electronically filed income tax return.

☐ As an officer of the corporation, I will enter my PIN as my signature on the corporation's electronically filed income tax return.

DocuSigned by:

Howard Enslin

Officer's signature

45A1469E59414CC...Date 10/16/2023Title Director**Part III Certification and Authentication****ERO's EFIN/PIN.** Enter your six-digit EFIN followed by your five-digit self-selected PIN.1 3 0 4 9 9 1 3 4 0 0do not enter all zeros

I certify that the above numeric entry is my PIN, which is my signature on the electronically filed income tax return for the corporation indicated above. I confirm that I am submitting this return in accordance with the requirements of **Pub. 3112**, IRS e-file Application and Participation, and **Pub. 4163**, Modernized e-File (MeF) Information for Authorized IRS e-file Providers for Business Returns.

DocuSigned by:

Raheem Spivey

ERO's signature

AAE7D95FBCF1481...

Date

ERO Must Retain This Form - See Instructions**Do Not Submit This Form to the IRS Unless Requested To Do So**

For Paperwork Reduction Act Notice, see instructions.

Form **8879-CORP** (12-2022)

Form 1120 Department of the Treasury Internal Revenue Service	U.S. Corporation Income Tax Return For calendar year 2022 or tax year beginning _____, ending _____ Go to www.irs.gov/Form1120 for instructions and the latest information.	OMB No. 1545-0123 <div style="font-size: 2em; font-weight: bold;">2022</div>
--	--	---

A Check if: 1a Consolidated return (attach Form 851) <input checked="" type="checkbox"/> b Life/nonlife consolidated return <input type="checkbox"/> 2 Personal holding co. (attach Sch. PH) <input type="checkbox"/> 3 Personal service corp. (see instructions) <input type="checkbox"/> 4 Schedule M-3 attached <input checked="" type="checkbox"/>	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:10%; text-align: center;">TYPE OR PRINT</td> <td> Name Global Benefits Group Inc and Subs Number, street, and room or suite no. If a P.O. box, see instructions. 27051 Towne Centre Drive, #210 City or town, state or province, country, and ZIP or foreign postal code FOOTHILL RANCH, CA 92610 </td> </tr> </table>	TYPE OR PRINT	Name Global Benefits Group Inc and Subs Number, street, and room or suite no. If a P.O. box, see instructions. 27051 Towne Centre Drive, #210 City or town, state or province, country, and ZIP or foreign postal code FOOTHILL RANCH, CA 92610	B Employer identification number 20-3842750 C Date incorporated 11/28/2005 D Total assets (see instructions) \$ 85,092,775.
TYPE OR PRINT	Name Global Benefits Group Inc and Subs Number, street, and room or suite no. If a P.O. box, see instructions. 27051 Towne Centre Drive, #210 City or town, state or province, country, and ZIP or foreign postal code FOOTHILL RANCH, CA 92610			

E Check if:	(1)	Initial return	(2)	Final return	(3)	Name change	(4)	<input checked="" type="checkbox"/> Address change
--------------------	-----	----------------	-----	--------------	-----	-------------	-----	--

Income		1a	73,302,265.		
	1a Gross receipts or sales				
	b Returns and allowances	1b			
	c Balance. Subtract line 1b from line 1a			1c	73,302,265.
	2 Cost of goods sold (attach Form 1125-A)			2	
	3 Gross profit. Subtract line 2 from line 1c			3	73,302,265.
	4 Dividends and inclusions (Schedule C, line 23)			4	357,200.
	5 Interest			5	
	6 Gross rents			6	
	7 Gross royalties			7	
	8 Capital gain net income (attach Schedule D (Form 1120))			8	
	9 Net gain or (loss) from Form 4797, Part II, line 17 (attach Form 4797)			9	
	10 Other income (see instructions - attach statement)		See Statement. 3.	10	14,532,338.
	11 Total income. Add lines 3 through 10			11	88,191,803.

Deductions (See instructions for limitations on deductions.)					
	12 Compensation of officers (see instructions - attach Form 1125-E)			12	
	13 Salaries and wages (less employment credits)			13	21,367,568.
	14 Repairs and maintenance			14	
	15 Bad debts			15	
	16 Rents			16	769,386.
	17 Taxes and licenses		See Statement. 4.	17	1,430,547.
	18 Interest (see instructions)			18	180,082.
	19 Charitable contributions		See Statement. 5.	19	
	20 Depreciation from Form 4562 not claimed on Form 1125-A or elsewhere on return (attach Form 4562)			20	2,269,360.
	21 Depletion			21	
	22 Advertising			22	1,593,974.
	23 Pension, profit-sharing, etc., plans			23	1,848,177.
	24 Employee benefit programs			24	3,214,157.
	25 Reserved for future use			25	
	26 Other deductions (attach statement)		See Statement. 6.	26	56,760,629.
	27 Total deductions. Add lines 12 through 26			27	89,433,880.
	28 Taxable income before net operating loss deduction and special deductions. Subtract line 27 from line 11			28	-1,242,077.
	29a Net operating loss deduction (see instructions)	29a	NONE		Stmnt 8
	b Special deductions (Schedule C, line 24)	29b			
	c Add lines 29a and 29b			29c	NONE

Tax, Refundable Credits, and Payments					
	30 Taxable income. Subtract line 29c from line 28. See instructions			30	-1,242,077.
	31 Total tax (Schedule J, Part I, line 11)			31	
	32 Reserved for future use			32	
	33 Total payments and credits (Schedule J, Part III, line 23)			33	260,300.
	34 Estimated tax penalty. See instructions. Check if Form 2220 is attached <input type="checkbox"/>			34	
	35 Amount owed. If line 33 is smaller than the total of lines 31 and 34, enter amount owed			35	
	36 Overpayment. If line 33 is larger than the total of lines 31 and 34, enter amount overpaid			36	260,300.
	37 Enter amount from line 36 you want: Credited to 2023 estimated tax 260,300. Refunded			37	

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.

Sign Here	Signature of Officer <u>Howard Enrich</u> Date <u>10/16/2023</u>	Director Title	May the IRS discuss this return with the preparer shown below? See instructions. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
------------------	---	-------------------	---

Paid Preparer Use Only	Print/Type preparer's name Preparer's signature <u>Raheem Spivey</u> Date	Check <input type="checkbox"/> if self-employed PTIN <u>P01372345</u> Firm's EIN <u>92-0460586</u> Phone no. <u>646-471-3000</u>
-------------------------------	---	---

For Paperwork Reduction Act Notice, see separate instructions.

Form 1120 (2022)

Form **7004**
(Rev. December 2018)**Application for Automatic Extension of Time To File Certain Business Income Tax, Information, and Other Returns**

OMB No. 1545-0233

Department of the Treasury
Internal Revenue Service

► File a separate application for each return.

► Go to www.irs.gov/Form7004 for instructions and the latest information.**Print
or
Type**

Name

Global Benefits Group Inc and Subs

Identifying number

20-3842750

Number, street, and room or suite no. (If P.O. box, see instructions.)

27422 PORTOLA PARKWAY - SUITE 100

City, town, state, and ZIP code (If a foreign address, enter city, province or state, and country (follow the country's practice for entering postal code).)

FOOTHILL RANCH, CA 92610**Note:** File request for extension by the due date of the return. See instructions before completing this form.**Part I Automatic Extension for Certain Business Income Tax, Information, and Other Returns.** See instructions.**1** Enter the form code for the return listed below that this application is for. 1 2

Application Is For:	Form Code	Application Is For:	Form Code
Form 706-GS(D)	01	Form 1120-ND (section 4951 taxes)	20
Form 706-GS(T)	02	Form 1120-PC	21
Form 1041 (bankruptcy estate only)	03	Form 1120-POL	22
Form 1041 (estate other than a bankruptcy estate)	04	Form 1120-REIT	23
Form 1041 (trust)	05	Form 1120-RIC	24
Form 1041-N	06	Form 1120S	25
Form 1041-QFT	07	Form 1120-SF	26
Form 1042	08	Form 3520-A	27
Form 1065	09	Form 8612	28
Form 1066	11	Form 8613	29
Form 1120	12	Form 8725	30
Form 1120-C	34	Form 8804	31
Form 1120-F	15	Form 8831	32
Form 1120-FSC	16	Form 8876	33
Form 1120-H	17	Form 8924	35
Form 1120-L	18	Form 8928	36
Form 1120-ND	19		

Part II All Filers Must Complete This Part

- 2** If the organization is a foreign corporation that does not have an office or place of business in the United States, check here. ☐
- 3** If the organization is a corporation and is the common parent of a group that intends to file a consolidated return, check here. ☒
If checked, attach a statement listing the name, address, and employer identification number (EIN) for each member covered by this application. See Statement 1
- 4** If the organization is a corporation or partnership that qualifies under Regulations section 1.6081-5, check here. ☐
- 5a** The application is for calendar year 20 22, or tax year beginning _____, 20 __, and ending _____, 20 __
- b Short tax year.** If this tax year is less than 12 months, check the reason: ☐ Initial return ☐ Final return
☐ Change in accounting period ☐ Consolidated return to be filed ☐ Other (See instructions - attach explanation)

6 Tentative total tax	6	NONE
7 Total payments and credits. See instructions	7	NONE
8 Balance due. Subtract line 7 from line 6. See instructions	8	NONE

For Privacy Act and Paperwork Reduction Act Notice, see separate instructions.

Form **7004** (Rev. 12-2018)

Schedule C Dividends, Inclusions, and Special Deductions (see instructions)	(a) Dividends and inclusions	(b) %	(c) Special deductions (a) x (b)
1 Dividends from less-than-20%-owned domestic corporations (other than debt-financed stock)		50	
2 Dividends from 20%-or-more-owned domestic corporations (other than debt-financed stock)		65	
3 Dividends on certain debt-financed stock of domestic and foreign corporations		See instructions	
4 Dividends on certain preferred stock of less-than-20%-owned public utilities		23.3	
5 Dividends on certain preferred stock of 20%-or-more-owned public utilities		26.7	
6 Dividends from less-than-20%-owned foreign corporations and certain FSCs		50	
7 Dividends from 20%-or-more-owned foreign corporations and certain FSCs		65	
8 Dividends from wholly owned foreign subsidiaries		100	
9 Subtotal. Add lines 1 through 8. See instructions for limitations		See instructions	
10 Dividends from domestic corporations received by a small business investment company operating under the Small Business Investment Act of 1958		100	
11 Dividends from affiliated group members		100	
12 Dividends from certain FSCs		100	
13 Foreign-source portion of dividends received from a specified 10%-owned foreign corporation (excluding hybrid dividends) (see instructions)		100	
14 Dividends from foreign corporations not included on line 3, 6, 7, 8, 11, 12, or 13 (including any hybrid dividends)			
15 Reserved for future use			
16a Subpart F inclusions derived from the sale by a controlled foreign corporation (CFC) of the stock of a lower-tier foreign corporation treated as a dividend (attach Form(s) 5471) (see instructions)		100	
b Subpart F inclusions derived from hybrid dividends of tiered corporations (attach Form(s) 5471) (see instructions)			
c Other inclusions from CFCs under subpart F not included on line 16a, 16b, or 17 (attach Form(s) 5471) (see instructions)			
17 Global Intangible Low-Taxed Income (GILTI) (attach Form(s) 5471 and Form 8992)	357,200.		
18 Gross-up for foreign taxes deemed paid			
19 IC-DISC and former DISC dividends not included on line 1, 2, or 3			
20 Other dividends			
21 Deduction for dividends paid on certain preferred stock of public utilities			
22 Section 250 deduction (attach Form 8993)			
23 Total dividends and inclusions. Add column (a), lines 9 through 20. Enter here and on page 1, line 4	357,200.		
24 Total special deductions. Add column (c), lines 9 through 22. Enter here and on page 1, line 29b			

Schedule J Tax Computation and Payment (see instructions)

Part I - Tax Computation

1	Check if the corporation is a member of a controlled group (attach Schedule O (Form 1120)). See instructions	<input checked="" type="checkbox"/>	
2	Income tax. See instructions		2
3	Base erosion minimum tax amount (attach Form 8991)		3
4	Add lines 2 and 3		4
5a	Foreign tax credit (attach Form 1118)	5a	
b	Credit from Form 8834 (see instructions)	5b	
c	General business credit (attach Form 3800)	5c	
d	Credit for prior year minimum tax (attach Form 8827)	5d	
e	Bond credits from Form 8912	5e	
6	Total credits. Add lines 5a through 5e		6
7	Subtract line 6 from line 4		7
8	Personal holding company tax (attach Schedule PH (Form 1120))		8
9a	Recapture of investment credit (attach Form 4255)	9a	
b	Recapture of low-income housing credit (attach Form 8611)	9b	
c	Interest due under the look-back method - completed long-term contracts (attach Form 8697)	9c	
d	Interest due under the look-back method - income forecast method (attach Form 8866)	9d	
e	Alternative tax on qualifying shipping activities (attach Form 8902)	9e	
f	Interest/tax due under section 453A(c) and/or section 453(l)	9f	
g	Other (see instructions - attach statement)	9g	
10	Total. Add lines 9a through 9g		10
11	Total tax. Add lines 7, 8, and 10. Enter here and on page 1, line 31		11

Part II - Reserved For Future Use

12	Reserved for future use	12	
----	-------------------------	----	--

Part III - Payments and Refundable Credits

13	2021 overpayment credited to 2022	13	
14	2022 estimated tax payments	14	260,300.
15	2022 refund applied for on Form 4466	15	()
16	Combine lines 13, 14, and 15	16	260,300.
17	Tax deposited with Form 7004	17	NONE
18	Withholding (see instructions)	18	
19	Total payments. Add lines 16, 17, and 18	19	260,300.
20	Refundable credits from:		
a	Form 2439	20a	
b	Form 4136	20b	
c	Reserved for future use	20c	
d	Other (attach statement - see instructions)	20d	
21	Total credits. Add lines 20a through 20d	21	
22	Reserved for future use	22	
23	Total payments and credits. Add lines 19 and 21. Enter here and on page 1, line 33	23	260,300.

Form **1120** (2022)

Form 1120 (2022)

Page 4

Schedule K Other Information (see instructions)

1	Check accounting method: a <input type="checkbox"/> Cash b <input checked="" type="checkbox"/> Accrual c <input type="checkbox"/> Other (specify) _____	Yes	No
2	See the instructions and enter the:		
a	Business activity code no. <u>524210</u>		
b	Business activity <u>BROKER</u>		
c	Product or service <u>INSURANCE PRODUCTS</u>		
3	Is the corporation a subsidiary in an affiliated group or a parent-subsidiary controlled group? If "Yes," enter name and EIN of the parent corporation _____		X
4	At the end of the tax year:		
a	Did any foreign or domestic corporation, partnership (including any entity treated as a partnership), trust, or tax-exempt organization own directly 20% or more, or own, directly or indirectly, 50% or more of the total voting power of all classes of the corporation's stock entitled to vote? If "Yes," complete Part I of Schedule G (Form 1120) (attach Schedule G).	X	
b	Did any individual or estate own directly 20% or more, or own, directly or indirectly, 50% or more of the total voting power of all classes of the corporation's stock entitled to vote? If "Yes," complete Part II of Schedule G (Form 1120) (attach Schedule G).		X
5	At the end of the tax year, did the corporation:		
a	Own directly 20% or more, or own, directly or indirectly, 50% or more of the total voting power of all classes of stock entitled to vote of any foreign or domestic corporation not included on Form 851 , Affiliations Schedule? For rules of constructive ownership, see instructions. If "Yes," complete (i) through (iv) below. <u>See Statement 12</u>	X	
(i) Name of Corporation		(ii) Employer Identification Number (if any)	(iii) Country of Incorporation
			(iv) Percentage Owned in Voting Stock
b	Own directly an interest of 20% or more, or own, directly or indirectly, an interest of 50% or more in any foreign or domestic partnership (including an entity treated as a partnership) or in the beneficial interest of a trust? For rules of constructive ownership, see instructions. If "Yes," complete (i) through (iv) below.		X
(i) Name of Entity		(ii) Employer Identification Number (if any)	(iii) Country of Organization
			(iv) Maximum Percentage Owned in Profit, Loss, or Capital
6	During this tax year, did the corporation pay dividends (other than stock dividends and distributions in exchange for stock) in excess of the corporation's current and accumulated earnings and profits? See sections 301 and 316 If "Yes," file Form 5452 , Corporate Report of Nondividend Distributions. See the instructions for Form 5452. If this is a consolidated return, answer here for the parent corporation and on Form 851 for each subsidiary.		X
7	At any time during the tax year, did one foreign person own, directly or indirectly, at least 25% of the total voting power of all classes of the corporation's stock entitled to vote or at least 25% of the total value of all classes of the corporation's stock? For rules of attribution, see section 318. If "Yes," enter: (a) Percentage owned <u>100.000</u> and (b) Owner's country <u>GK</u> (c) The corporation may have to file Form 5472 , Information Return of a 25% Foreign-Owned U.S. Corporation or a Foreign Corporation Engaged in a U.S. Trade or Business. Enter the number of Forms 5472 attached <u>3</u>	X	
8	Check this box if the corporation issued publicly offered debt instruments with original issue discount <input type="checkbox"/> If checked, the corporation may have to file Form 8281 , Information Return for Publicly Offered Original Issue Discount Instruments.		
9	Enter the amount of tax-exempt interest received or accrued during the tax year \$ _____		
10	Enter the number of shareholders at the end of the tax year (if 100 or fewer) <u>1</u>		
11	If the corporation has an NOL for the tax year and is electing to forego the carryback period, check here (see instructions) . . . <input type="checkbox"/> If the corporation is filing a consolidated return, the statement required by Regulations section 1.1502-21(b)(3) must be attached or the election will not be valid.		
12	Enter the available NOL carryover from prior tax years (do not reduce it by any deduction reported on page 1, line 29a.) \$ <u>37,283,166.</u>		

Form 1120 (2022)

JSA

2C1135 1.000

0001WA X45R

Form 1120 (2022)

Page 5

Schedule K Other Information (continued from page 4)

13	Are the corporation's total receipts (page 1, line 1a, plus lines 4 through 10) for the tax year and its total assets at the end of the tax year less than \$250,000?	Yes	No
	If "Yes," the corporation is not required to complete Schedules L, M-1, and M-2. Instead, enter the total amount of cash distributions and the book value of property distributions (other than cash) made during the tax year \$ _____		X
14	Is the corporation required to file Schedule UTP (Form 1120), Uncertain Tax Position Statement? See instructions		X
	If "Yes," complete and attach Schedule UTP.		
15 a	Did the corporation make any payments in 2022 that would require it to file Form(s) 1099?	X	
b	If "Yes," did or will the corporation file required Form(s) 1099?	X	
16	During this tax year, did the corporation have an 80%-or-more change in ownership, including a change due to redemption of its own stock?		X
17	During or subsequent to this tax year, but before the filing of this return, did the corporation dispose of more than 65% (by value) of its assets in a taxable, non-taxable, or tax deferred transaction?		X
18	Did the corporation receive assets in a section 351 transfer in which any of the transferred assets had a fair market basis or fair market value of more than \$1 million?		X
19	During the corporation's tax year, did the corporation make any payments that would require it to file Forms 1042 and 1042-S under chapter 3 (sections 1441 through 1464) or chapter 4 (sections 1471 through 1474) of the Code?		X
20	Is the corporation operating on a cooperative basis?		X
21	During the tax year, did the corporation pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? See instructions		X
	If "Yes," enter the total amount of the disallowed deductions \$ _____		
22	Does the corporation have gross receipts of at least \$500 million in any of the 3 preceding tax years? (See sections 59A(e)(2) and (3))		X
	If "Yes," complete and attach Form 8991.		
23	Did the corporation have an election under section 163(j) for any real property trade or business or any farming business in effect during the tax year? See instructions		X
24	Does the corporation satisfy one or more of the following? See instructions		X
a	The corporation owns a pass-through entity with current, or prior year carryover, excess business interest expense.		
b	The corporation's aggregate average annual gross receipts (determined under section 448(c)) for the 3 tax years preceding the current tax year are more than \$27 million and the corporation has business interest expense.		
c	The corporation is a tax shelter and the corporation has business interest expense.		
	If "Yes," complete and attach Form 8990.		
25	Is the corporation attaching Form 8996 to certify as a Qualified Opportunity Fund?		X
	If "Yes," enter amount from Form 8996, line 15 \$ _____		
26	Since December 22, 2017, did a foreign corporation directly or indirectly acquire substantially all of the properties held directly or indirectly by the corporation, and was the ownership percentage (by vote or value) for purposes of section 7874 greater than 50% (for example, the shareholders held more than 50% of the stock of the foreign corporation)? If "Yes," list the ownership percentage by vote and by value. See instructions		X
	Percentage: By Vote By Value		

Form 1120 (2022)

Form 1120 (2022)

Page 6

Schedule L Balance Sheets per Books		Beginning of tax year		End of tax year	
Assets		(a)	(b)	(c)	(d)
1	Cash		11,774,017.		9,439,592.
2a	Trade notes and accounts receivable	44,936,882.		18,246.	
b	Less allowance for bad debts	()	44,936,882.	()	18,246.
3	Inventories		NONE		NONE
4	U.S. government obligations				
5	Tax-exempt securities (see instructions)				
6	Other current assets (attach statement)	Stmt 17	25,402,951.		59,030,406.
7	Loans to shareholders				
8	Mortgage and real estate loans				
9	Other investments (attach statement)		1,309,685.		1,129,603.
10a	Buildings and other depreciable assets	17,188,584.		24,130,294.	
b	Less accumulated depreciation	(12,906,758.)	4,281,826.	(13,692,828.)	10,437,466.
11a	Depletable assets				
b	Less accumulated depletion	()		()	
12	Land (net of any amortization)				
13a	Intangible assets (amortizable only)	4,618,817.		4,618,817.	
b	Less accumulated amortization	()	4,618,817.	()	4,618,817.
14	Other assets (attach statement)	Stmt 19	2,974,650.		418,645.
15	Total assets		95,298,828.		85,092,775.
Liabilities and Shareholders' Equity					
16	Accounts payable		18,719,149.		1,352,858.
17	Mortgages, notes, bonds payable in less than 1 year				
18	Other current liabilities (attach statement)	Stmt 21	126,127,245.		137,808,499.
19	Loans from shareholders				
20	Mortgages, notes, bonds payable in 1 year or more				
21	Other liabilities (attach statement)	Stmt 23	81,238.		NONE
22	Capital stock: a Preferred stock				
b	Common stock	1,118.	1,118.	1,117.	1,117.
23	Additional paid-in capital		4,664,124.		4,664,124.
24	Retained earnings - Appropriated (attach statement)				
25	Retained earnings - Unappropriated		-54,694,046.		-59,133,823.
26	Adjustments to shareholders' equity (attach statement)				
27	Less cost of treasury stock		(-400,000.)		(-400,000.)
28	Total liabilities and shareholders' equity		95,298,828.		85,092,775.

Schedule M-1 Reconciliation of Income (Loss) per Books With Income per Return

Note: The corporation may be required to file Schedule M-3. See instructions.

1	Net income (loss) per books		7	Income recorded on books this year not included on this return (itemize): Tax-exempt interest \$ _____	
2	Federal income tax per books		8	Deductions on this return not charged against book income this year (itemize): a Depreciation \$ _____ b Charitable contributions \$ _____	
3	Excess of capital losses over capital gains		9	Add lines 7 and 8	
4	Income subject to tax not recorded on books this year (itemize): _____		10	Income (page 1, line 28) - line 6 less line 9	
5	Expenses recorded on books this year not deducted on this return (itemize): a Depreciation \$ _____ b Charitable contributions \$ _____ c Travel and entertainment \$ _____				
6	Add lines 1 through 5				

Schedule M-2 Analysis of Unappropriated Retained Earnings per Books (Schedule L, Line 25)

1	Balance at beginning of year	-54,694,046.	5	Distributions: a Cash	
2	Net income (loss) per books	-4,507,548.	b	Stock	
3	Other increases (itemize): _____		c	Property	
	See Statement 26	13,844,533.	6	Other decreases (itemize) Stmt 26	13,776,762.
4	Add lines 1, 2, and 3	-45,357,061.	7	Add lines 5 and 6	13,776,762.
			8	Balance at end of year (line 4 less line 7)	-59,133,823.

Form 1120 (2022)

**SCHEDULE G
(Form 1120)**(Rev. December 2011)
Department of the Treasury
Internal Revenue Service**Information on Certain Persons Owning the
Corporation's Voting Stock**▶ Attach to Form 1120.
▶ See instructions on page 2.

OMB No. 1545-0123

Name	Employer identification number (EIN)
Global Benefits Group Inc and Subs	20-3842750

Part I **Certain Entities Owning the Corporation's Voting Stock.** (Form 1120, Schedule K, Question 4a). Complete columns (i) through (v) below for any foreign or domestic corporation, partnership (including any entity treated as a partnership), trust, or tax-exempt organization that owns directly 20% or more, or owns, directly or indirectly, 50% or more of the total voting power of all classes of the corporation's stock entitled to vote (see instructions).

(i) Name of Entity	(ii) Employer Identification Number (if any)	(iii) Type of Entity	(iv) Country of Organization	(v) Percentage Owned in Voting Stock
GBG INSURANCE LMTIED	98-1289938	CORPORATION	GK	100.000

Part II **Certain Individuals and Estates Owning the Corporation's Voting Stock.** (Form 1120, Schedule K, Question 4b). Complete columns (i) through (iv) below for any individual or estate that owns directly 20% or more, or owns, directly or indirectly, 50% or more of the total voting power of all classes of the corporation's stock entitled to vote (see instructions).

(i) Name of Individual or Estate	(ii) Identifying Number (if any)	(iii) Country of Citizenship (see instructions)	(iv) Percentage Owned in Voting Stock

SCHEDULE N
(Form 1120)Department of the Treasury
Internal Revenue Service**Foreign Operations of U.S. Corporations**

Attach to Form 1120, 1120-C, 1120-IC-DISC, 1120-L, 1120-PC, 1120-REIT, 1120-RIC, or 1120-S.

Go to www.irs.gov/Form1120 for the latest information.

OMB No. 1545-0123

2022

Name

Global Benefits Group Inc and Subs

Employer identification number (EIN)

20-3842750

Foreign Operations Information

	Yes	No
1a During the tax year, did the corporation own (directly or indirectly) any foreign entity that was disregarded as an entity separate from its owner under Regulations sections 301.7701-2 and 301.7701-3 or did the corporation own (directly or indirectly) any foreign branch (see instructions)?		X
If "Yes," you are generally required to attach Form 8858 , Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (FDEs) and Foreign Branches (FBs), for each FDE and for each FB (see instructions).		
b Enter the number of Forms 8858 attached to the corporation's tax return.		
2 Enter the number of Forms 8865 , Return of U.S. Persons With Respect to Certain Foreign Partnerships, attached to the corporation's tax return.		
3 Excluding any partnership for which a Form 8865 is attached to the tax return, did the corporation own at least a 10% interest, directly or indirectly, in any other foreign partnership (including an entity treated as a foreign partnership under Regulations section 301.7701-2 or 301.7701-3)? If "Yes," see instructions for required statement.		X
4a Reserved for future use.		
b Enter the number of Forms 5471 , Information Return of U.S. Persons With Respect to Certain Foreign Corporations, attached to the corporation's tax return. <u>8</u>		
5 During the tax year, did the corporation receive a distribution from, or was it the grantor of, or transferor to, a foreign trust? If "Yes," the corporation may have to file Form 3520 , Annual Return To Report Transactions With Foreign Trusts and Receipt of Certain Foreign Gifts.		X
6a At any time during the 2022 calendar year, did the corporation have an interest in or a signature or other authority over a financial account (such as a bank account, securities account, or other financial account) in a foreign country?	X	
b See the instructions for exceptions and filing requirements for FinCEN Form 114 , Report of Foreign Bank and Financial Accounts (FBAR). See Statement 27 If "Yes," enter the name of the foreign country <u>OC</u>		
7a Is the corporation claiming the extraterritorial income exclusion? If "Yes," attach a separate Form 8873 , Extraterritorial Income Exclusion, for each transaction or group of transactions.		X
b Enter the number of Forms 8873 attached to the tax return.		
c Enter the total of the amounts from line 52 (extraterritorial income exclusion (net of disallowed deductions)) of all Forms 8873 attached to the tax return \$		
8 Was the corporation a specified domestic entity required to file Form 8938 for the tax year (see the Instructions for Form 8938)?		X

For Paperwork Reduction Act Notice, see the Instructions for Form 1120.

Schedule N (Form 1120) 2022

**SCHEDULE O
(Form 1120)**

(Rev. December 2018)

Department of the Treasury
Internal Revenue Service**Consent Plan and Apportionment Schedule
for a Controlled Group**

▶ Attach to Form 1120, 1120-C, 1120-F, 1120-FSC, 1120-L, 1120-PC, 1120-REIT, or 1120-RIC.

▶ Go to www.irs.gov/Form1120 for instructions and the latest information.

OMB No. 1545-0123

Name <u>Global Benefits Group Inc and Subs</u>	Employer identification number <u>20-3842750</u>
---	---

Part I Apportionment Plan Information

1 Type of controlled group:

- a ☒ Parent-subsidiary group
b ☐ Brother-sister group
c ☐ Combined group
d ☐ Life insurance companies only

2 This corporation has been a member of this group:

- a ☒ For the entire year.
b ☐ From _____, until _____.

3 This corporation consents and represents to:

- a ☐ Adopt an apportionment plan. All the other members of this group are adopting an apportionment plan effective for the current tax year which ends on _____, and for all succeeding tax years.
b ☐ Amend the current apportionment plan. All the other members of this group are currently amending a previously adopted plan, which was in effect for the tax year ending _____, and for all succeeding tax years.
c ☐ Terminate the current apportionment plan and not adopt a new plan. All the other members of this group are not adopting an apportionment plan.
d ☐ Terminate the current apportionment plan and adopt a new plan. All the other members of this group are adopting an apportionment plan effective for the current tax year which ends on _____, and for all succeeding tax years.

4 If you checked box 3c or 3d above, check the applicable box below to indicate if the termination of the current apportionment plan was:

- a ☐ Elected by the component members of the group.
b ☐ Required for the component members of the group.

5 If you did not check a box on line 3 above, check the applicable box below concerning the status of the group's apportionment plan (see instructions).

- a ☒ No apportionment plan is in effect and none is being adopted.
b ☐ An apportionment plan is already in effect. It was adopted for the tax year ending _____, and for all succeeding tax years.

6 If all the members of this group are adopting a plan or amending the current plan for a tax year after the due date (including extensions) of the tax return for this corporation, is there at least one year remaining on the statute of limitations from the date this corporation filed its amended return for such tax year for assessing any resulting deficiency?

See instructions.

- a ☐ Yes.
(i) ☐ The statute of limitations for this year will expire on _____.
(ii) ☐ On _____, this corporation entered into an agreement with the Internal Revenue Service to extend the statute of limitations for purposes of assessment until _____.
b ☐ No. The members may not adopt or amend an apportionment plan.

7 ☐ If the corporation has a short tax year that does not include December 31, check the box. See instructions.

Schedule O (Form 1120) (Rev. 12-2018)

Page **2**

Part II Apportionment (See instructions)

(a) Group member's name and employer identification number	(b) Tax year end (Yr-Mo)	Apportionment			
		(c) Accumulated earnings credit	(d) Penalty for failure to pay estimated tax	(e) Other	
1 _____ Global Benefits Group, Inc. & Subs	20-3842750	2022-12	NONE	NONE	NONE
2 _____ GBG U.S. Group Holding Company & Subs	30-1271279	2022-12	NONE	NONE	NONE
3 _____					
4 _____					
5 _____					
6 _____					
7 _____					
8 _____					
9 _____					
10 _____					
Total			NONE	NONE	NONE

Schedule O (Form 1120) (Rev. 12-2018)

**SCHEDULE B
(Form 1120)**

(Rev. December 2018)

Department of the Treasury
Internal Revenue Service**Additional Information for Schedule M-3 Filers**

OMB No. 1545-0123

► **Attach to Form 1120.**► **Go to www.irs.gov/Form1120 for the latest information.**

Name Global Benefits Group Inc		Employer identification number (EIN) 20-3842750	
1	Does any amount reported on Schedule M-3 (Form 1120), Part II, line 9 or 10, column (d), reflect allocations to this corporation from a partnership of income, gain, loss, deduction, or credit that are disproportionate to this corporation's capital contribution to the partnership or its ratio for sharing other items of the partnership?	Yes	No
			X
2	At any time during the tax year, did the corporation sell, exchange, or transfer any interest in an intangible asset to a related person as defined in section 267(b)?		X
3	At any time during the tax year, did the corporation acquire any interest in an intangible asset from a related person as defined in section 267(b)?		X
4a	During the tax year, did the corporation enter into a cost-sharing arrangement with any related foreign party on whose behalf the corporation did not file Form 5471, Information Return of U.S. Persons With Respect To Certain Foreign Corporations?		X
b	At any time during the tax year, was the corporation a participant in a cost-sharing arrangement with any related foreign party on whose behalf the corporation did not file Form 5471?		X
5	At any time during the tax year, did the corporation make any change in accounting principle for financial accounting purposes? See instructions for the definition of "change in accounting principle"		X
6	At any time during the tax year, did the corporation make any change in a method of accounting for U.S. income tax purposes?		X
7	At any time during the tax year, did the corporation own any voluntary employees' beneficiary association (VEBA) trusts that were used to hold funds designated for employee benefits?		X
8	At any time during the tax year, did the corporation use an allocation method for indirect costs capitalized to self-constructed assets that varied from its financial method of accounting?		X
9	At any time during the tax year, did the corporation treat for tax purposes indirect costs, as defined in Regulations sections 1.263A-1(e)(3)(ii)(F), (G), and (H), as mixed-service costs, as defined in Regulations section 1.263A-1(e)(4)(ii)(C)?		X
10	Did the corporation, under section 118 or 362(c) and the related regulations, take a return filing position characterizing any amount as a contribution to the capital of the corporation during the tax year by any nonshareholders? Amounts so characterized may include, without limitation, incentives, inducements, money, and property.		X

For Paperwork Reduction Act Notice, see the Instructions for Form 1120.

Schedule B (Form 1120) (Rev. 12-2018)

Form **851**
(Rev. October 2016)
Department of the Treasury
Internal Revenue Service

For tax year ending

12/31/2022

Affiliations Schedule

OMB No. 1545-0123

► **File with each consolidated income tax return.**► **Information about Form 851 and its instructions is at www.irs.gov/form851.**

Name of common parent corporation

Global Benefits Group Inc

Employer identification number

20-3842750

Number, street, and room or suite no. If a P.O. box, see instructions.

27051 Towne Centre Drive, #210

City or town, state, and ZIP code

FOOTHILL RANCH, CA

92610

Part I Overpayment Credits, Estimated Tax Payments, and Tax Deposits (see instructions)

Corp. No.	Name and address of corporation	Employer identification number	Portion of overpayment credits and estimated tax payments	Portion of tax deposited with Form 7004
1	Common parent corporation		260,300.	
2	Subsidiary corporations: GBG Administrative Services 27051 Towne Centre Drive, #210 FOOTHILL RANCH, CA 92610	26-4068764		
3	GBG Assist, Inc. 27051 Towne Centre Drive, #210 FOOTHILL RANCH, CA 92610	37-1797452		
4	International Claims Services, Inc. 27051 Towne Centre Drive, #210 FOOTHILL RANCH, CA 92610	98-0076650		
5	GBG Holdings, Inc. 27051 Towne Centre Drive, #210 FOOTHILL RANCH, CA 92610	33-0950280		
6	Global Benefits Group, US Inc. 27051 Towne Centre Drive, #210 FOOTHILL RANCH, CA 92610	20-4570749		
Totals (Must equal amounts shown on the consolidated tax return.)			260,300.	

Part II Principal Business Activity, Voting Stock Information, Etc. (see instructions)

Corp. No.	Principal business activity (PBA)	PBA Code No.	Did the subsidiary make any nondividend distributions?		Stock holdings at beginning of year			
			Yes	No	Number of shares	Percentage of voting power	Percentage of value	Owned by corporation no.
1	Common parent corporation BROKER	524210						
2	Subsidiary corporations: BROKER & ASSISTANCE	524210		X		100.00%	100.00%	1
3	BROKER	524210		X		100.00%	100.00%	1
4	BROKER	524210		X		100.00%	100.00%	1
5	BROKER	524210		X		100.00%	100.00%	1
6	BROKER	524210		X		100.00%	100.00%	1
						%	%	1

JSA For Paperwork Reduction Act Notice, see instructions.

2C2010 1.000

0001WA X45R

20-3842750

Form **851** (Rev. 10-2016)

Form **851**
(Rev. October 2016)
Department of the Treasury
Internal Revenue Service

Affiliations Schedule

For tax year ending 12/31/2022

OMB No. 1545-0123

► **File with each consolidated income tax return.**► **Information about Form 851 and its instructions is at www.irs.gov/form851.**

Name of common parent corporation <u>Global Benefits Group Inc</u>	Employer identification number <u>20-3842750</u>
Number, street, and room or suite no. If a P.O. box, see instructions. <u>27051 Towne Centre Drive, #210</u>	
City or town, state, and ZIP code <u>FOOTHILL RANCH, CA</u> <u>92610</u>	

Part I Overpayment Credits, Estimated Tax Payments, and Tax Deposits (see instructions)

Corp. No.	Name and address of corporation	Employer identification number	Portion of overpayment credits and estimated tax payments	Portion of tax deposited with Form 7004
	Common parent corporation			
	Subsidiary corporations:			
Totals (Must equal amounts shown on the consolidated tax return.) ►				

Part II Principal Business Activity, Voting Stock Information, Etc. (see instructions)

Corp. No.	Principal business activity (PBA)	PBA Code No.	Did the subsidiary make any nondividend distributions?		Stock holdings at beginning of year			
			Yes	No	Number of shares	Percentage of voting power	Percentage of value	Owned by corporation no.
	Common parent corporation							
	Subsidiary corporations:							
						%	%	1
						%	%	
						%	%	
						%	%	
						%	%	
						%	%	
						%	%	

JSA For Paperwork Reduction Act Notice, see instructions.

2C2010 1.000

0001WA X45R

20-3842750

Form **851** (Rev. 10-2016)

Part III **Changes in Stock Holdings During the Tax Year**

Corp. No.	Name of corporation	Share- holder of Corpora- tion No.	Date of transaction	(a) Changes		(b) Shares held after changes described in column (a)	
				Number of shares acquired	Number of shares disposed of	Percentage of voting power	Percentage of value
						%	%
						%	%
						%	%
						%	%
						%	%
						%	%
						%	%
						%	%

(c) If any transaction listed above caused a transfer of a share of subsidiary stock (defined to include dispositions and deconsolidations), did the share's basis exceed its value at the time of the transfer? See instructions ☐ Yes ☒ No

(d) Did any share of subsidiary stock become worthless within the meaning of section 165 (taking into account the provisions of Regulations section 1.1502-80(c)) during the taxable year? See instructions ☐ Yes ☒ No

(e) If the equitable owners of any capital stock shown above were other than the holders of record, provide details of the changes.

(f) If additional stock was issued, or if any stock was retired during the year, list the dates and amounts of these transactions.

Part IV Additional Stock Information (see instructions)

1 During the tax year, did the corporation have more than one class of stock outstanding? ☐ Yes ☒ No

If "Yes," enter the name of the corporation and list and describe each class of stock.

Corp. No.	Name of corporation	Class of stock

2 During the tax year, was there any member of the consolidated group that reaffiliated within 60 months of disaffiliation? ☐ Yes ☒ No

If "Yes," enter the name of the corporation(s) and explain the circumstances.

Corp. No.	Name of corporation	Explanation

3 During the tax year, was there any arrangement in existence by which one or more persons that were not members of the affiliated group could acquire any stock, or acquire any voting power without acquiring stock, in the corporation, other than a de minimis amount, from the corporation or another member of the affiliated group? ☐ Yes ☒ No

If "Yes," enter the name of the corporation and see the instructions for the percentages to enter in columns (a), (b), and (c).

Corp. No.	Name of corporation	(a) Percentage of value	(b) Percentage of outstanding voting stock	(c) Percentage of voting power

Corp. No.	(d) Provide a description of any arrangement.

SCHEDULE M-3**(Form 1120)**(Rev. December 2019)
Department of the Treasury
Internal Revenue Service**Net Income (Loss) Reconciliation for Corporations
With Total Assets of \$10 Million or More**

▶ Attach to Form 1120 or 1120-C.

▶ Go to www.irs.gov/Form1120 for instructions and the latest information.

OMB No. 1545-0123

Name of corporation (common parent, if consolidated return)

Employer identification number

Global Benefits Group Inc

20-3842750

Check applicable box(es): (1) ☐ Non-consolidated return (2) ☒ Consolidated return (Form 1120 only)
(3) ☐ Mixed 1120/L/PC group (4) ☐ Dormant subsidiaries schedule attached

Part I Financial Information and Net Income (Loss) Reconciliation (see instructions)**1 a** Did the corporation file SEC Form 10-K for its income statement period ending with or within this tax year?

- ☐ Yes. Skip lines 1b and 1c and complete lines 2a through 11 with respect to that SEC Form 10-K.
☒ No. Go to line 1b. See instructions if multiple non-tax-basis income statements are prepared.

b Did the corporation prepare a certified audited non-tax-basis income statement for that period?

- ☐ Yes. Skip line 1c and complete lines 2a through 11 with respect to that income statement.
☒ No. Go to line 1c.

c Did the corporation prepare a non-tax-basis income statement for that period?

- ☒ Yes. Complete lines 2a through 11 with respect to that income statement.
☐ No. Skip lines 2a through 3c and enter the corporation's net income (loss) per its books and records on line 4a.

2 a Enter the income statement period: Beginning 01/01/2022 Ending 12/31/2022**b** Has the corporation's income statement been restated for the income statement period on line 2a?

- ☐ Yes. (If "Yes," attach an explanation and the amount of each item restated.)
☒ No.

c Has the corporation's income statement been restated for any of the five income statement periods immediately preceding the period on line 2a?

- ☐ Yes. (If "Yes," attach an explanation and the amount of each item restated.)
☒ No.

3 a Is any of the corporation's voting common stock publicly traded?

- ☐ Yes.
☒ No. If "No," go to line 4a.

b Enter the symbol of the corporation's primary U.S. publicly traded voting common stock**c** Enter the nine-digit CUSIP number of the corporation's primary publicly traded voting common stock**4 a** Worldwide consolidated net income (loss) from income statement source identified in Part I, line 1**4a** -4,507,548.**b** Indicate accounting standard used for line 4a (see instructions):

- (1) ☒ GAAP (2) ☐ IFRS (3) ☐ Statutory (4) ☐ Tax-basis (5) ☐ Other (specify) _____

5 a Net income from nonincludible foreign entities (attach statement) Stmt. 28.**5a** ()**b** Net loss from nonincludible foreign entities (attach statement and enter as a positive amount)**5b** ()**6 a** Net income from nonincludible U.S. entities (attach statement) Stmt. 28.**6a** ()**b** Net loss from nonincludible U.S. entities (attach statement and enter as a positive amount)**6b** ()**7 a** Net income (loss) of other includible foreign disregarded entities (attach statement)**7a** ()**b** Net income (loss) of other includible U.S. disregarded entities (attach statement)**7b** ()**c** Net income (loss) of other includible entities (attach statement)**7c** ()**8** Adjustment to eliminations of transactions between includible entities and nonincludible entities (attach statement)**8** ()**9** Adjustment to reconcile income statement period to tax year (attach statement)**9** ()**10 a** Intercompany dividend adjustments to reconcile to line 11 (attach statement)**10a** ()**b** Other statutory accounting adjustments to reconcile to line 11 (attach statement)**10b** ()**c** Other adjustments to reconcile to amount on line 11 (attach statement)**10c** ()**11** Net income (loss) per income statement of includible corporations. Combine lines 4 through 10.**11** -4,507,548.**Note:** Part I, line 11, must equal Part II, line 30, column (a), or Schedule M-1, line 1 (see instructions).**12** Enter the total amount (not just the corporation's share) of the assets and liabilities of all entities included or removed on the following lines.

	Total Assets	Total Liabilities
a Included on Part I, line 4		
b Removed on Part I, line 5		
c Removed on Part I, line 6		
d Included on Part I, line 7		

For Paperwork Reduction Act Notice, see the Instructions for Form 1120.

Schedule M-3 (Form 1120) (Rev. 12-2019)

Schedule M-3 (Form 1120) (Rev. 12-2019)

Page **2**

Name of corporation (common parent, if consolidated return)

Employer identification number

Global Benefits Group Inc

20-3842750

Check applicable box(es): (1) ☒ Consolidated group (2) ☐ Parent corp (3) ☐ Consolidated eliminations (4) ☐ Subsidiary corp (5) ☐ Mixed 1120/L/PC groupCheck if a sub-consolidated: (6) ☐ 1120 group (7) ☐ 1120 eliminations

Name of subsidiary (if consolidated return)

Employer identification number

Part II Reconciliation of Net Income (Loss) per Income Statement of Includible Corporations With Taxable Income per Return (see instructions)

Income (Loss) Items (Attach statements for lines 1 through 12)	(a) Income (Loss) per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Income (Loss) per Tax Return
1 Income (loss) from equity method foreign corporations				
2 Gross foreign dividends not previously taxed				
3 Subpart F, QEF, and similar income inclusions		2,009.	355,191.	357,200.
4 Gross-up for foreign taxes deemed paid . .				
5 Gross foreign distributions previously taxed .				
6 Income (loss) from equity method U.S. corporations				
7 U.S. dividends not eliminated in tax consolidation				
8 Minority interest for includible corporations .				
9 Income (loss) from U.S. partnerships . . .				
10 Income (loss) from foreign partnerships . .				
11 Income (loss) from other pass-through entities				
12 Items relating to reportable transactions . .				
13 Interest income (see instructions)				
14 Total accrual to cash adjustment				
15 Hedging transactions				
16 Mark-to-market income (loss)				
17 Cost of goods sold (see instructions) . . .	()			()
18 Sale versus lease (for sellers and/or lessors)				
19 Section 481(a) adjustments				
20 Unearned/deferred revenue				
21 Income recognition from long-term contracts				
22 Original issue discount and other imputed interest .				
23 a Income statement gain/loss on sale, exchange, abandonment, worthlessness, or other disposition of assets other than inventory and pass-through entities	-361,753.	361,753.		
b Gross capital gains from Schedule D, excluding amounts from pass-through entities				
c Gross capital losses from Schedule D, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses		-361,753.		-361,753.
d Net gain/loss reported on Form 4797, line 17, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses				
e Abandonment losses				
f Worthless stock losses (attach statement) . .				
g Other gain/loss on disposition of assets other than inventory				
24 Capital loss limitation and carryforward used				
25 Other income (loss) items with differences (attach statement)				
26 Total income (loss) items. Combine lines 1 through 25	-361,753.	2,009.	355,191.	-4,553.
27 Total expense/deduction items (from Part III, line 39)	-9,009,229.	2,543,602.	364,669.	-6,100,958.
28 Other items with no differences	4,863,434.			4,863,434.
29 a Mixed groups, see instructions. All others, combine lines 26 through 28	-4,507,548.	2,545,611.	719,860.	-1,242,077.
b PC insurance subgroup reconciliation totals				
c Life insurance subgroup reconciliation totals				
30 Reconciliation totals. Combine lines 29a through 29c	-4,507,548.	2,545,611.	719,860.	-1,242,077.

Note: Line 30, column (a), must equal Part I, line 11, and column (d) must equal Form 1120, page 1, line 28.

Schedule M-3 (Form 1120) (Rev. 12-2019)

JSA

2C2731 1.000

0001WA X45R

Name of corporation (common parent, if consolidated return)	Employer identification number
Global Benefits Group Inc	20-3842750
Check applicable box(es): (1) <input checked="" type="checkbox"/> Consolidated group (2) <input type="checkbox"/> Parent corp (3) <input type="checkbox"/> Consolidated eliminations (4) <input type="checkbox"/> Subsidiary corp (5) <input type="checkbox"/> Mixed 1120/L/PC group	
Check if a sub-consolidated: (6) <input type="checkbox"/> 1120 group (7) <input type="checkbox"/> 1120 eliminations	
Name of subsidiary (if consolidated return)	Employer identification number

Part III Reconciliation of Net Income (Loss) per Income Statement of Includible Corporations With Taxable Income per Return - Expense/Deduction Items (see instructions)

Expense/Deduction Items	(a) Expense per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Deduction per Tax Return
1 U.S. current income tax expense	277,010.		-277,010.	
2 U.S. deferred income tax expense				
3 State and local current income tax expense	28,441.	16,568.		45,009.
4 State and local deferred income tax expense				
5 Foreign current income tax expense (other than foreign withholding taxes)				
6 Foreign deferred income tax expense				
7 Foreign withholding taxes				
8 Interest expense (see instructions)	180,082.			180,082.
9 Stock option expense				
10 Other equity-based compensation				
11 Meals and entertainment	169,226.		-87,659.	81,567.
12 Fines and penalties				
13 Judgments, damages, awards, and similar costs				
14 Parachute payments				
15 Compensation with section 162(m) limitation				
16 Pension and profit-sharing	1,860,857.			1,860,857.
17 Other post-retirement benefits				
18 Deferred compensation				
19 Charitable contribution of cash and tangible property				
20 Charitable contribution of intangible property				
21 Charitable contribution limitation/carryforward				
22 Domestic production activities deduction (see instructions)				
23 Current year acquisition or reorganization investment banking fees				
24 Current year acquisition or reorganization legal and accounting fees				
25 Current year acquisition/reorganization other costs				
26 Amortization/impairment of goodwill				
27 Amortization of acquisition, reorganization, and start-up costs				
28 Other amortization or impairment write-offs		53,224.		53,224.
29 Reserved				
30 Depletion				
31 Depreciation	4,083,673.	-1,814,312.		2,269,361.
32 Bad debt expense				
33 Corporate owned life insurance premiums				
34 Purchase versus lease (for purchasers and/or lessees)				
35 Research and development costs				
36 Section 118 exclusion (attach statement)				
37 Section 162(r) - FDIC premiums paid by certain large financial institutions (see instructions)				
38 Other expense/deduction items with differences (attach statement)	Stmnt 33 2,409,940.	-799,082.		1,610,858.
39 Total expense/deduction items. Combine lines 1 through 38. Enter here and on Part II, line 27, reporting positive amounts as negative and negative amounts as positive	9,009,229.	-2,543,602.	-364,669.	6,100,958.

Name of corporation (common parent, if consolidated return) Global Benefits Group Inc		Employer identification number 20-3842750
Check applicable box(es): (1) <input type="checkbox"/> Consolidated group (2) <input checked="" type="checkbox"/> Parent corp (3) <input type="checkbox"/> Consolidated eliminations (4) <input type="checkbox"/> Subsidiary corp (5) <input type="checkbox"/> Mixed 1120/L/PC group		
Check if a sub-consolidated: (6) <input type="checkbox"/> 1120 group (7) <input type="checkbox"/> 1120 eliminations		
Name of subsidiary (if consolidated return) Global Benefits Group Inc		Employer identification number 20-3842750

Part II Reconciliation of Net Income (Loss) per Income Statement of Includible Corporations With Taxable Income per Return (see instructions)

Income (Loss) Items (Attach statements for lines 1 through 12)	(a) Income (Loss) per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Income (Loss) per Tax Return
1 Income (loss) from equity method foreign corporations				
2 Gross foreign dividends not previously taxed				
3 Subpart F, QEF, and similar income inclusions		2,009.	355,191.	357,200.
4 Gross-up for foreign taxes deemed paid . .				
5 Gross foreign distributions previously taxed .				
6 Income (loss) from equity method U.S. corporations				
7 U.S. dividends not eliminated in tax consolidation				
8 Minority interest for includible corporations .				
9 Income (loss) from U.S. partnerships . . .				
10 Income (loss) from foreign partnerships . .				
11 Income (loss) from other pass-through entities				
12 Items relating to reportable transactions . .				
13 Interest income (see instructions)				
14 Total accrual to cash adjustment				
15 Hedging transactions				
16 Mark-to-market income (loss)				
17 Cost of goods sold (see instructions) . . .	()			()
18 Sale versus lease (for sellers and/or lessors)				
19 Section 481(a) adjustments				
20 Unearned/deferred revenue				
21 Income recognition from long-term contracts				
22 Original issue discount and other imputed interest .				
23 a Income statement gain/loss on sale, exchange, abandonment, worthlessness, or other disposition of assets other than inventory and pass-through entities				
b Gross capital gains from Schedule D, excluding amounts from pass-through entities				
c Gross capital losses from Schedule D, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses				
d Net gain/loss reported on Form 4797, line 17, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses				
e Abandonment losses				
f Worthless stock losses (attach statement) . .				
g Other gain/loss on disposition of assets other than inventory				
24 Capital loss limitation and carryforward used				
25 Other income (loss) items with differences (attach statement)				
26 Total income (loss) items. Combine lines 1 through 25		2,009.	355,191.	357,200.
27 Total expense/deduction items (from Part III, line 39)	-8,816,367.	2,544,752.	364,669.	-5,906,946.
28 Other items with no differences	-3,499,947.			-3,499,947.
29 a Mixed groups, see instructions. All others, combine lines 26 through 28	-12,316,314.	2,546,761.	719,860.	-9,049,693.
b PC insurance subgroup reconciliation totals				
c Life insurance subgroup reconciliation totals				
30 Reconciliation totals. Combine lines 29a through 29c	-12,316,314.	2,546,761.	719,860.	-9,049,693.

Note: Line 30, column (a), must equal Part I, line 11, and column (d) must equal Form 1120, page 1, line 28.

Name of corporation (common parent, if consolidated return) Global Benefits Group Inc		Employer identification number 20-3842750
Check applicable box(es): (1) <input type="checkbox"/> Consolidated group (2) <input checked="" type="checkbox"/> Parent corp (3) <input type="checkbox"/> Consolidated eliminations (4) <input type="checkbox"/> Subsidiary corp (5) <input type="checkbox"/> Mixed 1120/L/PC group		
Check if a sub-consolidated: (6) <input type="checkbox"/> 1120 group (7) <input type="checkbox"/> 1120 eliminations		
Name of subsidiary (if consolidated return) Global Benefits Group Inc		Employer identification number 20-3842750

Part III Reconciliation of Net Income (Loss) per Income Statement of Includible Corporations With Taxable Income per Return - Expense/Deduction Items (see instructions)

Expense/Deduction Items	(a) Expense per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Deduction per Tax Return
1 U.S. current income tax expense	277,010.		-277,010.	
2 U.S. deferred income tax expense				
3 State and local current income tax expense	28,341.	15,418.		43,759.
4 State and local deferred income tax expense				
5 Foreign current income tax expense (other than foreign withholding taxes)				
6 Foreign deferred income tax expense				
7 Foreign withholding taxes				
8 Interest expense (see instructions)				
9 Stock option expense				
10 Other equity-based compensation				
11 Meals and entertainment	169,226.		-87,659.	81,567.
12 Fines and penalties				
13 Judgments, damages, awards, and similar costs				
14 Parachute payments				
15 Compensation with section 162(m) limitation				
16 Pension and profit-sharing	1,848,177.			1,848,177.
17 Other post-retirement benefits				
18 Deferred compensation				
19 Charitable contribution of cash and tangible property				
20 Charitable contribution of intangible property				
21 Charitable contribution limitation/carryforward				
22 Domestic production activities deduction (see instructions)				
23 Current year acquisition or reorganization investment banking fees				
24 Current year acquisition or reorganization legal and accounting fees				
25 Current year acquisition/reorganization other costs				
26 Amortization/impairment of goodwill				
27 Amortization of acquisition, reorganization, and start-up costs				
28 Other amortization or impairment write-offs		53,224.		53,224.
29 Reserved				
30 Depletion				
31 Depreciation	4,083,673.	-1,814,312.		2,269,361.
32 Bad debt expense				
33 Corporate owned life insurance premiums				
34 Purchase versus lease (for purchasers and/or lessees)				
35 Research and development costs				
36 Section 118 exclusion (attach statement)				
37 Section 162(r) - FDIC premiums paid by certain large financial institutions (see instructions)				
38 Other expense/deduction items with differences (attach statement)	2,409,940.	-799,082.		1,610,858.
39 Total expense/deduction items. Combine lines 1 through 38. Enter here and on Part II, line 27, reporting positive amounts as negative and negative amounts as positive	8,816,367.	-2,544,752.	-364,669.	5,906,946.

Name of corporation (common parent, if consolidated return) Global Benefits Group Inc	Employer identification number 20-3842750
Check applicable box(es): (1) <input type="checkbox"/> Consolidated group (2) <input type="checkbox"/> Parent corp (3) <input type="checkbox"/> Consolidated eliminations (4) <input checked="" type="checkbox"/> Subsidiary corp (5) <input type="checkbox"/> Mixed 1120/L/PC group	
Check if a sub-consolidated: (6) <input type="checkbox"/> 1120 group (7) <input type="checkbox"/> 1120 eliminations	
Name of subsidiary (if consolidated return) GBG Administrative Services	Employer identification number 26-4068764

Part II Reconciliation of Net Income (Loss) per Income Statement of Includible Corporations With Taxable Income per Return (see instructions)

Income (Loss) Items (Attach statements for lines 1 through 12)	(a) Income (Loss) per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Income (Loss) per Tax Return
1 Income (loss) from equity method foreign corporations				
2 Gross foreign dividends not previously taxed				
3 Subpart F, QEF, and similar income inclusions				
4 Gross-up for foreign taxes deemed paid . .				
5 Gross foreign distributions previously taxed .				
6 Income (loss) from equity method U.S. corporations				
7 U.S. dividends not eliminated in tax consolidation				
8 Minority interest for includible corporations .				
9 Income (loss) from U.S. partnerships . . .				
10 Income (loss) from foreign partnerships . .				
11 Income (loss) from other pass-through entities				
12 Items relating to reportable transactions . .				
13 Interest income (see instructions)				
14 Total accrual to cash adjustment				
15 Hedging transactions				
16 Mark-to-market income (loss)				
17 Cost of goods sold (see instructions) . . .	()			()
18 Sale versus lease (for sellers and/or lessors)				
19 Section 481(a) adjustments				
20 Unearned/deferred revenue				
21 Income recognition from long-term contracts				
22 Original issue discount and other imputed interest .				
23 a Income statement gain/loss on sale, exchange, abandonment, worthlessness, or other disposition of assets other than inventory and pass-through entities	-206.	206.		
b Gross capital gains from Schedule D, excluding amounts from pass-through entities				
c Gross capital losses from Schedule D, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses		-206.		-206.
d Net gain/loss reported on Form 4797, line 17, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses				
e Abandonment losses				
f Worthless stock losses (attach statement) . .				
g Other gain/loss on disposition of assets other than inventory				
24 Capital loss limitation and carryforward used				
25 Other income (loss) items with differences (attach statement)				
26 Total income (loss) items. Combine lines 1 through 25	-206.			-206.
27 Total expense/deduction items (from Part III, line 39)	-100.	-1,150.		-1,250.
28 Other items with no differences	1,448,706.			1,448,706.
29 a Mixed groups, see instructions. All others, combine lines 26 through 28	1,448,400.	-1,150.		1,447,250.
b PC insurance subgroup reconciliation totals				
c Life insurance subgroup reconciliation totals				
30 Reconciliation totals. Combine lines 29a through 29c	1,448,400.	-1,150.		1,447,250.

Note: Line 30, column (a), must equal Part I, line 11, and column (d) must equal Form 1120, page 1, line 28.

Name of corporation (common parent, if consolidated return) Global Benefits Group Inc		Employer identification number 20-3842750
Check applicable box(es): (1) <input type="checkbox"/> Consolidated group (2) <input type="checkbox"/> Parent corp (3) <input type="checkbox"/> Consolidated eliminations (4) <input checked="" type="checkbox"/> Subsidiary corp (5) <input type="checkbox"/> Mixed 1120/L/PC group		
Check if a sub-consolidated: (6) <input type="checkbox"/> 1120 group (7) <input type="checkbox"/> 1120 eliminations		
Name of subsidiary (if consolidated return) GBG Administrative Services		Employer identification number 26-4068764

Part III Reconciliation of Net Income (Loss) per Income Statement of Includible Corporations With Taxable Income per Return - Expense/Deduction Items (see instructions)

Expense/Deduction Items	(a) Expense per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Deduction per Tax Return
1 U.S. current income tax expense				
2 U.S. deferred income tax expense				
3 State and local current income tax expense	100.	1,150.		1,250.
4 State and local deferred income tax expense				
5 Foreign current income tax expense (other than foreign withholding taxes)				
6 Foreign deferred income tax expense				
7 Foreign withholding taxes				
8 Interest expense (see instructions)				
9 Stock option expense				
10 Other equity-based compensation				
11 Meals and entertainment				
12 Fines and penalties				
13 Judgments, damages, awards, and similar costs				
14 Parachute payments				
15 Compensation with section 162(m) limitation				
16 Pension and profit-sharing				
17 Other post-retirement benefits				
18 Deferred compensation				
19 Charitable contribution of cash and tangible property				
20 Charitable contribution of intangible property				
21 Charitable contribution limitation/carryforward				
22 Domestic production activities deduction (see instructions)				
23 Current year acquisition or reorganization investment banking fees				
24 Current year acquisition or reorganization legal and accounting fees				
25 Current year acquisition/reorganization other costs				
26 Amortization/impairment of goodwill				
27 Amortization of acquisition, reorganization, and start-up costs				
28 Other amortization or impairment write-offs				
29 Reserved				
30 Depletion				
31 Depreciation				
32 Bad debt expense				
33 Corporate owned life insurance premiums				
34 Purchase versus lease (for purchasers and/or lessees)				
35 Research and development costs				
36 Section 118 exclusion (attach statement)				
37 Section 162(r) - FDIC premiums paid by certain large financial institutions (see instructions)				
38 Other expense/deduction items with differences (attach statement)				
39 Total expense/deduction items. Combine lines 1 through 38. Enter here and on Part II, line 27, reporting positive amounts as negative and negative amounts as positive	100.	1,150.		1,250.

Schedule M-3 (Form 1120) (Rev. 12-2019)

Page **2**

Name of corporation (common parent, if consolidated return) Global Benefits Group Inc		Employer identification number 20-3842750
Check applicable box(es): (1) <input type="checkbox"/> Consolidated group (2) <input type="checkbox"/> Parent corp (3) <input type="checkbox"/> Consolidated eliminations (4) <input checked="" type="checkbox"/> Subsidiary corp (5) <input type="checkbox"/> Mixed 1120/L/PC group		
Check if a sub-consolidated: (6) <input type="checkbox"/> 1120 group (7) <input type="checkbox"/> 1120 eliminations		
Name of subsidiary (if consolidated return) GBG Assist, Inc.		Employer identification number 37-1797452

Part II Reconciliation of Net Income (Loss) per Income Statement of Includible Corporations With Taxable Income per Return (see instructions)

Income (Loss) Items (Attach statements for lines 1 through 12)	(a) Income (Loss) per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Income (Loss) per Tax Return
1 Income (loss) from equity method foreign corporations				
2 Gross foreign dividends not previously taxed				
3 Subpart F, QEF, and similar income inclusions				
4 Gross-up for foreign taxes deemed paid				
5 Gross foreign distributions previously taxed				
6 Income (loss) from equity method U.S. corporations				
7 U.S. dividends not eliminated in tax consolidation				
8 Minority interest for includible corporations				
9 Income (loss) from U.S. partnerships				
10 Income (loss) from foreign partnerships				
11 Income (loss) from other pass-through entities				
12 Items relating to reportable transactions				
13 Interest income (see instructions)				
14 Total accrual to cash adjustment				
15 Hedging transactions				
16 Mark-to-market income (loss)				
17 Cost of goods sold (see instructions)	()			()
18 Sale versus lease (for sellers and/or lessors)				
19 Section 481(a) adjustments				
20 Unearned/deferred revenue				
21 Income recognition from long-term contracts				
22 Original issue discount and other imputed interest				
23 a Income statement gain/loss on sale, exchange, abandonment, worthlessness, or other disposition of assets other than inventory and pass-through entities	-604.	604.		
b Gross capital gains from Schedule D, excluding amounts from pass-through entities				
c Gross capital losses from Schedule D, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses		-604.		-604.
d Net gain/loss reported on Form 4797, line 17, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses				
e Abandonment losses				
f Worthless stock losses (attach statement)				
g Other gain/loss on disposition of assets other than inventory				
24 Capital loss limitation and carryforward used				
25 Other income (loss) items with differences (attach statement)				
26 Total income (loss) items. Combine lines 1 through 25	-604.			-604.
27 Total expense/deduction items (from Part III, line 39)	-192,762.			-192,762.
28 Other items with no differences	7,357,166.			7,357,166.
29 a Mixed groups, see instructions. All others, combine lines 26 through 28	7,163,800.			7,163,800.
b PC insurance subgroup reconciliation totals				
c Life insurance subgroup reconciliation totals				
30 Reconciliation totals. Combine lines 29a through 29c	7,163,800.			7,163,800.

Note: Line 30, column (a), must equal Part I, line 11, and column (d) must equal Form 1120, page 1, line 28.

Schedule M-3 (Form 1120) (Rev. 12-2019)

JSA

2C2731 1.000

0001WA X45R

Name of corporation (common parent, if consolidated return)

Employer identification number

Global Benefits Group Inc

20-3842750

Check applicable box(es): (1) ☐ Consolidated group (2) ☐ Parent corp (3) ☐ Consolidated eliminations (4) ☒ Subsidiary corp (5) ☐ Mixed 1120/L/PC groupCheck if a sub-consolidated: (6) ☐ 1120 group (7) ☐ 1120 eliminations

Name of subsidiary (if consolidated return)

Employer identification number

GBG Assist, Inc.

37-1797452

Part III Reconciliation of Net Income (Loss) per Income Statement of Includible Corporations With Taxable Income per Return - Expense/Deduction Items (see instructions)

Expense/Deduction Items	(a) Expense per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Deduction per Tax Return
1 U.S. current income tax expense				
2 U.S. deferred income tax expense				
3 State and local current income tax expense				
4 State and local deferred income tax expense				
5 Foreign current income tax expense (other than foreign withholding taxes)				
6 Foreign deferred income tax expense				
7 Foreign withholding taxes				
8 Interest expense (see instructions)	180,082.			180,082.
9 Stock option expense				
10 Other equity-based compensation				
11 Meals and entertainment				
12 Fines and penalties				
13 Judgments, damages, awards, and similar costs				
14 Parachute payments				
15 Compensation with section 162(m) limitation				
16 Pension and profit-sharing	12,680.			12,680.
17 Other post-retirement benefits				
18 Deferred compensation				
19 Charitable contribution of cash and tangible property				
20 Charitable contribution of intangible property				
21 Charitable contribution limitation/carryforward				
22 Domestic production activities deduction (see instructions)				
23 Current year acquisition or reorganization investment banking fees				
24 Current year acquisition or reorganization legal and accounting fees				
25 Current year acquisition/reorganization other costs				
26 Amortization/impairment of goodwill				
27 Amortization of acquisition, reorganization, and start-up costs				
28 Other amortization or impairment write-offs				
29 Reserved				
30 Depletion				
31 Depreciation				
32 Bad debt expense				
33 Corporate owned life insurance premiums				
34 Purchase versus lease (for purchasers and/or lessees)				
35 Research and development costs				
36 Section 118 exclusion (attach statement)				
37 Section 162(r) - FDIC premiums paid by certain large financial institutions (see instructions)				
38 Other expense/deduction items with differences (attach statement)				
39 Total expense/deduction items. Combine lines 1 through 38. Enter here and on Part II, line 27, reporting positive amounts as negative and negative amounts as positive	192,762.			192,762.

Name of corporation (common parent, if consolidated return) Global Benefits Group Inc	Employer identification number 20-3842750
Check applicable box(es): (1) <input type="checkbox"/> Consolidated group (2) <input type="checkbox"/> Parent corp (3) <input type="checkbox"/> Consolidated eliminations (4) <input checked="" type="checkbox"/> Subsidiary corp (5) <input type="checkbox"/> Mixed 1120/L/PC group	
Check if a sub-consolidated: (6) <input type="checkbox"/> 1120 group (7) <input type="checkbox"/> 1120 eliminations	
Name of subsidiary (if consolidated return) International Claims Services, Inc.	Employer identification number 98-0076650

Part II Reconciliation of Net Income (Loss) per Income Statement of Includible Corporations With Taxable Income per Return (see instructions)

Income (Loss) Items (Attach statements for lines 1 through 12)	(a) Income (Loss) per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Income (Loss) per Tax Return
1 Income (loss) from equity method foreign corporations				
2 Gross foreign dividends not previously taxed				
3 Subpart F, QEF, and similar income inclusions				
4 Gross-up for foreign taxes deemed paid . .				
5 Gross foreign distributions previously taxed .				
6 Income (loss) from equity method U.S. corporations				
7 U.S. dividends not eliminated in tax consolidation				
8 Minority interest for includible corporations .				
9 Income (loss) from U.S. partnerships . . .				
10 Income (loss) from foreign partnerships . .				
11 Income (loss) from other pass-through entities				
12 Items relating to reportable transactions . .				
13 Interest income (see instructions)				
14 Total accrual to cash adjustment				
15 Hedging transactions				
16 Mark-to-market income (loss)				
17 Cost of goods sold (see instructions) . . .	()			()
18 Sale versus lease (for sellers and/or lessors)				
19 Section 481(a) adjustments				
20 Unearned/deferred revenue				
21 Income recognition from long-term contracts				
22 Original issue discount and other imputed interest .				
23 a Income statement gain/loss on sale, exchange, abandonment, worthlessness, or other disposition of assets other than inventory and pass-through entities	-360,943.	360,943.		
b Gross capital gains from Schedule D, excluding amounts from pass-through entities				
c Gross capital losses from Schedule D, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses		-360,943.		-360,943.
d Net gain/loss reported on Form 4797, line 17, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses				
e Abandonment losses				
f Worthless stock losses (attach statement) . .				
g Other gain/loss on disposition of assets other than inventory				
24 Capital loss limitation and carryforward used				
25 Other income (loss) items with differences (attach statement)				
26 Total income (loss) items. Combine lines 1 through 25	-360,943.			-360,943.
27 Total expense/deduction items (from Part III, line 39)				
28 Other items with no differences	-442,491.			-442,491.
29 a Mixed groups, see instructions. All others, combine lines 26 through 28	-803,434.			-803,434.
b PC insurance subgroup reconciliation totals				
c Life insurance subgroup reconciliation totals				
30 Reconciliation totals. Combine lines 29a through 29c	-803,434.			-803,434.

Note: Line 30, column (a), must equal Part I, line 11, and column (d) must equal Form 1120, page 1, line 28.

Name of corporation (common parent, if consolidated return)		Employer identification number
Global Benefits Group Inc		20-3842750
Check applicable box(es): (1) <input type="checkbox"/> Consolidated group (2) <input type="checkbox"/> Parent corp (3) <input type="checkbox"/> Consolidated eliminations (4) <input checked="" type="checkbox"/> Subsidiary corp (5) <input type="checkbox"/> Mixed 1120/L/PC group		
Check if a sub-consolidated: (6) <input type="checkbox"/> 1120 group (7) <input type="checkbox"/> 1120 eliminations		
Name of subsidiary (if consolidated return)		Employer identification number
International Claims Services, Inc.		98-0076650

Part III Reconciliation of Net Income (Loss) per Income Statement of Includible Corporations With Taxable Income per Return - Expense/Deduction Items (see instructions)

Expense/Deduction Items	(a) Expense per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Deduction per Tax Return
1 U.S. current income tax expense				
2 U.S. deferred income tax expense				
3 State and local current income tax expense				
4 State and local deferred income tax expense				
5 Foreign current income tax expense (other than foreign withholding taxes)				
6 Foreign deferred income tax expense				
7 Foreign withholding taxes				
8 Interest expense (see instructions)				
9 Stock option expense				
10 Other equity-based compensation				
11 Meals and entertainment				
12 Fines and penalties				
13 Judgments, damages, awards, and similar costs				
14 Parachute payments				
15 Compensation with section 162(m) limitation				
16 Pension and profit-sharing				
17 Other post-retirement benefits				
18 Deferred compensation				
19 Charitable contribution of cash and tangible property				
20 Charitable contribution of intangible property				
21 Charitable contribution limitation/carryforward				
22 Domestic production activities deduction (see instructions)				
23 Current year acquisition or reorganization investment banking fees				
24 Current year acquisition or reorganization legal and accounting fees				
25 Current year acquisition/reorganization other costs				
26 Amortization/impairment of goodwill				
27 Amortization of acquisition, reorganization, and start-up costs				
28 Other amortization or impairment write-offs				
29 Reserved				
30 Depletion				
31 Depreciation				
32 Bad debt expense				
33 Corporate owned life insurance premiums				
34 Purchase versus lease (for purchasers and/or lessees)				
35 Research and development costs				
36 Section 118 exclusion (attach statement)				
37 Section 162(r) - FDIC premiums paid by certain large financial institutions (see instructions)				
38 Other expense/deduction items with differences (attach statement)				
39 Total expense/deduction items. Combine lines 1 through 38. Enter here and on Part II, line 27, reporting positive amounts as negative and negative amounts as positive				

Name of corporation (common parent, if consolidated return) Global Benefits Group Inc		Employer identification number 20-3842750
Check applicable box(es): (1) <input type="checkbox"/> Consolidated group (2) <input type="checkbox"/> Parent corp (3) <input type="checkbox"/> Consolidated eliminations (4) <input checked="" type="checkbox"/> Subsidiary corp (5) <input type="checkbox"/> Mixed 1120/L/PC group		
Check if a sub-consolidated: (6) <input type="checkbox"/> 1120 group (7) <input type="checkbox"/> 1120 eliminations		
Name of subsidiary (if consolidated return) GBG Holdings, Inc.		Employer identification number 33-0950280

Part II Reconciliation of Net Income (Loss) per Income Statement of Includible Corporations With Taxable Income per Return (see instructions)

Income (Loss) Items (Attach statements for lines 1 through 12)	(a) Income (Loss) per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Income (Loss) per Tax Return
1 Income (loss) from equity method foreign corporations				
2 Gross foreign dividends not previously taxed				
3 Subpart F, QEF, and similar income inclusions				
4 Gross-up for foreign taxes deemed paid . .				
5 Gross foreign distributions previously taxed .				
6 Income (loss) from equity method U.S. corporations				
7 U.S. dividends not eliminated in tax consolidation				
8 Minority interest for includible corporations .				
9 Income (loss) from U.S. partnerships . . .				
10 Income (loss) from foreign partnerships . .				
11 Income (loss) from other pass-through entities				
12 Items relating to reportable transactions . .				
13 Interest income (see instructions)				
14 Total accrual to cash adjustment				
15 Hedging transactions				
16 Mark-to-market income (loss)				
17 Cost of goods sold (see instructions) . . .	()			()
18 Sale versus lease (for sellers and/or lessors)				
19 Section 481(a) adjustments				
20 Unearned/deferred revenue				
21 Income recognition from long-term contracts				
22 Original issue discount and other imputed interest .				
23 a Income statement gain/loss on sale, exchange, abandonment, worthlessness, or other disposition of assets other than inventory and pass-through entities				
b Gross capital gains from Schedule D, excluding amounts from pass-through entities				
c Gross capital losses from Schedule D, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses				
d Net gain/loss reported on Form 4797, line 17, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses				
e Abandonment losses				
f Worthless stock losses (attach statement) . .				
g Other gain/loss on disposition of assets other than inventory				
24 Capital loss limitation and carryforward used				
25 Other income (loss) items with differences (attach statement)				
26 Total income (loss) items. Combine lines 1 through 25				
27 Total expense/deduction items (from Part III, line 39)				
28 Other items with no differences				
29 a Mixed groups, see instructions. All others, combine lines 26 through 28				
b PC insurance subgroup reconciliation totals				
c Life insurance subgroup reconciliation totals				
30 Reconciliation totals. Combine lines 29a through 29c				

Note: Line 30, column (a), must equal Part I, line 11, and column (d) must equal Form 1120, page 1, line 28.

Name of corporation (common parent, if consolidated return)		Employer identification number
Global Benefits Group Inc		20-3842750
Check applicable box(es): (1) <input type="checkbox"/> Consolidated group (2) <input type="checkbox"/> Parent corp (3) <input type="checkbox"/> Consolidated eliminations (4) <input checked="" type="checkbox"/> Subsidiary corp (5) <input type="checkbox"/> Mixed 1120/L/PC group		
Check if a sub-consolidated: (6) <input type="checkbox"/> 1120 group (7) <input type="checkbox"/> 1120 eliminations		
Name of subsidiary (if consolidated return)		Employer identification number
GBG Holdings, Inc.		33-0950280

Part III Reconciliation of Net Income (Loss) per Income Statement of Includible Corporations With Taxable Income per Return - Expense/Deduction Items (see instructions)

Expense/Deduction Items	(a) Expense per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Deduction per Tax Return
1 U.S. current income tax expense				
2 U.S. deferred income tax expense				
3 State and local current income tax expense				
4 State and local deferred income tax expense				
5 Foreign current income tax expense (other than foreign withholding taxes)				
6 Foreign deferred income tax expense				
7 Foreign withholding taxes				
8 Interest expense (see instructions)				
9 Stock option expense				
10 Other equity-based compensation				
11 Meals and entertainment				
12 Fines and penalties				
13 Judgments, damages, awards, and similar costs				
14 Parachute payments				
15 Compensation with section 162(m) limitation				
16 Pension and profit-sharing				
17 Other post-retirement benefits				
18 Deferred compensation				
19 Charitable contribution of cash and tangible property				
20 Charitable contribution of intangible property				
21 Charitable contribution limitation/carryforward				
22 Domestic production activities deduction (see instructions)				
23 Current year acquisition or reorganization investment banking fees				
24 Current year acquisition or reorganization legal and accounting fees				
25 Current year acquisition/reorganization other costs				
26 Amortization/impairment of goodwill				
27 Amortization of acquisition, reorganization, and start-up costs				
28 Other amortization or impairment write-offs				
29 Reserved				
30 Depletion				
31 Depreciation				
32 Bad debt expense				
33 Corporate owned life insurance premiums				
34 Purchase versus lease (for purchasers and/or lessees)				
35 Research and development costs				
36 Section 118 exclusion (attach statement)				
37 Section 162(r) - FDIC premiums paid by certain large financial institutions (see instructions)				
38 Other expense/deduction items with differences (attach statement)				
39 Total expense/deduction items. Combine lines 1 through 38. Enter here and on Part II, line 27, reporting positive amounts as negative and negative amounts as positive				

Name of corporation (common parent, if consolidated return) Global Benefits Group Inc		Employer identification number 20-3842750
Check applicable box(es): (1) <input type="checkbox"/> Consolidated group (2) <input type="checkbox"/> Parent corp (3) <input type="checkbox"/> Consolidated eliminations (4) <input checked="" type="checkbox"/> Subsidiary corp (5) <input type="checkbox"/> Mixed 1120/L/PC group		
Check if a sub-consolidated: (6) <input type="checkbox"/> 1120 group (7) <input type="checkbox"/> 1120 eliminations		
Name of subsidiary (if consolidated return) Global Benefits Group, US Inc.		Employer identification number 20-4570749

Part II Reconciliation of Net Income (Loss) per Income Statement of Includible Corporations With Taxable Income per Return (see instructions)

Income (Loss) Items (Attach statements for lines 1 through 12)	(a) Income (Loss) per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Income (Loss) per Tax Return
1 Income (loss) from equity method foreign corporations				
2 Gross foreign dividends not previously taxed				
3 Subpart F, QEF, and similar income inclusions				
4 Gross-up for foreign taxes deemed paid . .				
5 Gross foreign distributions previously taxed .				
6 Income (loss) from equity method U.S. corporations				
7 U.S. dividends not eliminated in tax consolidation				
8 Minority interest for includible corporations .				
9 Income (loss) from U.S. partnerships . . .				
10 Income (loss) from foreign partnerships . .				
11 Income (loss) from other pass-through entities				
12 Items relating to reportable transactions . .				
13 Interest income (see instructions)				
14 Total accrual to cash adjustment				
15 Hedging transactions				
16 Mark-to-market income (loss)				
17 Cost of goods sold (see instructions) . . .	()			()
18 Sale versus lease (for sellers and/or lessors)				
19 Section 481(a) adjustments				
20 Unearned/deferred revenue				
21 Income recognition from long-term contracts				
22 Original issue discount and other imputed interest .				
23 a Income statement gain/loss on sale, exchange, abandonment, worthlessness, or other disposition of assets other than inventory and pass-through entities				
b Gross capital gains from Schedule D, excluding amounts from pass-through entities				
c Gross capital losses from Schedule D, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses				
d Net gain/loss reported on Form 4797, line 17, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses				
e Abandonment losses				
f Worthless stock losses (attach statement) . .				
g Other gain/loss on disposition of assets other than inventory				
24 Capital loss limitation and carryforward used				
25 Other income (loss) items with differences (attach statement)				
26 Total income (loss) items. Combine lines 1 through 25				
27 Total expense/deduction items (from Part III, line 39)				
28 Other items with no differences				
29 a Mixed groups, see instructions. All others, combine lines 26 through 28				
b PC insurance subgroup reconciliation totals				
c Life insurance subgroup reconciliation totals				
30 Reconciliation totals. Combine lines 29a through 29c				

Note: Line 30, column (a), must equal Part I, line 11, and column (d) must equal Form 1120, page 1, line 28.

Name of corporation (common parent, if consolidated return)		Employer identification number
Global Benefits Group Inc		20-3842750
Check applicable box(es): (1) <input type="checkbox"/> Consolidated group (2) <input type="checkbox"/> Parent corp (3) <input type="checkbox"/> Consolidated eliminations (4) <input checked="" type="checkbox"/> Subsidiary corp (5) <input type="checkbox"/> Mixed 1120/L/PC group		
Check if a sub-consolidated: (6) <input type="checkbox"/> 1120 group (7) <input type="checkbox"/> 1120 eliminations		
Name of subsidiary (if consolidated return)		Employer identification number
Global Benefits Group, US Inc.		20-4570749

Part III Reconciliation of Net Income (Loss) per Income Statement of Includible Corporations With Taxable Income per Return - Expense/Deduction Items (see instructions)

Expense/Deduction Items	(a) Expense per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Deduction per Tax Return
1 U.S. current income tax expense				
2 U.S. deferred income tax expense				
3 State and local current income tax expense				
4 State and local deferred income tax expense				
5 Foreign current income tax expense (other than foreign withholding taxes)				
6 Foreign deferred income tax expense				
7 Foreign withholding taxes				
8 Interest expense (see instructions)				
9 Stock option expense				
10 Other equity-based compensation				
11 Meals and entertainment				
12 Fines and penalties				
13 Judgments, damages, awards, and similar costs				
14 Parachute payments				
15 Compensation with section 162(m) limitation				
16 Pension and profit-sharing				
17 Other post-retirement benefits				
18 Deferred compensation				
19 Charitable contribution of cash and tangible property				
20 Charitable contribution of intangible property				
21 Charitable contribution limitation/carryforward				
22 Domestic production activities deduction (see instructions)				
23 Current year acquisition or reorganization investment banking fees				
24 Current year acquisition or reorganization legal and accounting fees				
25 Current year acquisition/reorganization other costs				
26 Amortization/impairment of goodwill				
27 Amortization of acquisition, reorganization, and start-up costs				
28 Other amortization or impairment write-offs				
29 Reserved				
30 Depletion				
31 Depreciation				
32 Bad debt expense				
33 Corporate owned life insurance premiums				
34 Purchase versus lease (for purchasers and/or lessees)				
35 Research and development costs				
36 Section 118 exclusion (attach statement)				
37 Section 162(r) - FDIC premiums paid by certain large financial institutions (see instructions)				
38 Other expense/deduction items with differences (attach statement)				
39 Total expense/deduction items. Combine lines 1 through 38. Enter here and on Part II, line 27, reporting positive amounts as negative and negative amounts as positive				

Name of corporation (common parent, if consolidated return) Global Benefits Group Inc		Employer identification number 20-3842750
Check applicable box(es): (1) <input type="checkbox"/> Consolidated group (2) <input type="checkbox"/> Parent corp (3) <input checked="" type="checkbox"/> Consolidated eliminations (4) <input type="checkbox"/> Subsidiary corp (5) <input type="checkbox"/> Mixed 1120/L/PC group		
Check if a sub-consolidated: (6) <input type="checkbox"/> 1120 group (7) <input type="checkbox"/> 1120 eliminations		
Name of subsidiary (if consolidated return) ELIMINATIONS		Employer identification number

Part II Reconciliation of Net Income (Loss) per Income Statement of Includible Corporations With Taxable Income per Return (see instructions)

Income (Loss) Items (Attach statements for lines 1 through 12)	(a) Income (Loss) per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Income (Loss) per Tax Return
1 Income (loss) from equity method foreign corporations				
2 Gross foreign dividends not previously taxed				
3 Subpart F, QEF, and similar income inclusions				
4 Gross-up for foreign taxes deemed paid . .				
5 Gross foreign distributions previously taxed .				
6 Income (loss) from equity method U.S. corporations				
7 U.S. dividends not eliminated in tax consolidation				
8 Minority interest for includible corporations .				
9 Income (loss) from U.S. partnerships . . .				
10 Income (loss) from foreign partnerships . .				
11 Income (loss) from other pass-through entities				
12 Items relating to reportable transactions . .				
13 Interest income (see instructions)				
14 Total accrual to cash adjustment				
15 Hedging transactions				
16 Mark-to-market income (loss)				
17 Cost of goods sold (see instructions) . . .	()			()
18 Sale versus lease (for sellers and/or lessors)				
19 Section 481(a) adjustments				
20 Unearned/deferred revenue				
21 Income recognition from long-term contracts				
22 Original issue discount and other imputed interest .				
23 a Income statement gain/loss on sale, exchange, abandonment, worthlessness, or other disposition of assets other than inventory and pass-through entities				
b Gross capital gains from Schedule D, excluding amounts from pass-through entities				
c Gross capital losses from Schedule D, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses				
d Net gain/loss reported on Form 4797, line 17, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses				
e Abandonment losses				
f Worthless stock losses (attach statement) . .				
g Other gain/loss on disposition of assets other than inventory				
24 Capital loss limitation and carryforward used				
25 Other income (loss) items with differences (attach statement)				
26 Total income (loss) items. Combine lines 1 through 25				
27 Total expense/deduction items (from Part III, line 39)				
28 Other items with no differences				
29 a Mixed groups, see instructions. All others, combine lines 26 through 28				
b PC insurance subgroup reconciliation totals				
c Life insurance subgroup reconciliation totals				
30 Reconciliation totals. Combine lines 29a through 29c				

Note: Line 30, column (a), must equal Part I, line 11, and column (d) must equal Form 1120, page 1, line 28.

Name of corporation (common parent, if consolidated return)		Employer identification number
Global Benefits Group Inc		20-3842750
Check applicable box(es): (1) <input type="checkbox"/> Consolidated group (2) <input type="checkbox"/> Parent corp (3) <input checked="" type="checkbox"/> Consolidated eliminations (4) <input type="checkbox"/> Subsidiary corp (5) <input type="checkbox"/> Mixed 1120/L/PC group		
Check if a sub-consolidated: (6) <input type="checkbox"/> 1120 group (7) <input type="checkbox"/> 1120 eliminations		
Name of subsidiary (if consolidated return)		Employer identification number
ELIMINATIONS		

Part III Reconciliation of Net Income (Loss) per Income Statement of Includible Corporations With Taxable Income per Return - Expense/Deduction Items (see instructions)

Expense/Deduction Items	(a) Expense per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Deduction per Tax Return
1 U.S. current income tax expense				
2 U.S. deferred income tax expense				
3 State and local current income tax expense				
4 State and local deferred income tax expense				
5 Foreign current income tax expense (other than foreign withholding taxes)				
6 Foreign deferred income tax expense				
7 Foreign withholding taxes				
8 Interest expense (see instructions)				
9 Stock option expense				
10 Other equity-based compensation				
11 Meals and entertainment				
12 Fines and penalties				
13 Judgments, damages, awards, and similar costs				
14 Parachute payments				
15 Compensation with section 162(m) limitation				
16 Pension and profit-sharing				
17 Other post-retirement benefits				
18 Deferred compensation				
19 Charitable contribution of cash and tangible property				
20 Charitable contribution of intangible property				
21 Charitable contribution limitation/carryforward				
22 Domestic production activities deduction (see instructions)				
23 Current year acquisition or reorganization investment banking fees				
24 Current year acquisition or reorganization legal and accounting fees				
25 Current year acquisition/reorganization other costs				
26 Amortization/impairment of goodwill				
27 Amortization of acquisition, reorganization, and start-up costs				
28 Other amortization or impairment write-offs				
29 Reserved				
30 Depletion				
31 Depreciation				
32 Bad debt expense				
33 Corporate owned life insurance premiums				
34 Purchase versus lease (for purchasers and/or lessees)				
35 Research and development costs				
36 Section 118 exclusion (attach statement)				
37 Section 162(r) - FDIC premiums paid by certain large financial institutions (see instructions)				
38 Other expense/deduction items with differences (attach statement)				
39 Total expense/deduction items. Combine lines 1 through 38. Enter here and on Part II, line 27, reporting positive amounts as negative and negative amounts as positive				

Name of corporation (common parent, if consolidated return) Global Benefits Group Inc		Employer identification number 20-3842750
Check applicable box(es): (1) <input type="checkbox"/> Consolidated group (2) <input type="checkbox"/> Parent corp (3) <input type="checkbox"/> Consolidated eliminations (4) <input type="checkbox"/> Subsidiary corp (5) <input type="checkbox"/> Mixed 1120/L/PC group		
Check if a sub-consolidated: (6) <input type="checkbox"/> 1120 group (7) <input type="checkbox"/> 1120 eliminations		
Name of subsidiary (if consolidated return)		Employer identification number
Adjustments		

Part II Reconciliation of Net Income (Loss) per Income Statement of Includible Corporations With Taxable Income per Return (see instructions)

Income (Loss) Items (Attach statements for lines 1 through 12)	(a) Income (Loss) per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Income (Loss) per Tax Return
1 Income (loss) from equity method foreign corporations				
2 Gross foreign dividends not previously taxed				
3 Subpart F, QEF, and similar income inclusions				
4 Gross-up for foreign taxes deemed paid . .				
5 Gross foreign distributions previously taxed .				
6 Income (loss) from equity method U.S. corporations				
7 U.S. dividends not eliminated in tax consolidation				
8 Minority interest for includible corporations .				
9 Income (loss) from U.S. partnerships . . .				
10 Income (loss) from foreign partnerships . .				
11 Income (loss) from other pass-through entities				
12 Items relating to reportable transactions . .				
13 Interest income (see instructions)				
14 Total accrual to cash adjustment				
15 Hedging transactions				
16 Mark-to-market income (loss)				
17 Cost of goods sold (see instructions) . . .	()			()
18 Sale versus lease (for sellers and/or lessors)				
19 Section 481(a) adjustments				
20 Unearned/deferred revenue				
21 Income recognition from long-term contracts				
22 Original issue discount and other imputed interest .				
23 a Income statement gain/loss on sale, exchange, abandonment, worthlessness, or other disposition of assets other than inventory and pass-through entities				
b Gross capital gains from Schedule D, excluding amounts from pass-through entities				
c Gross capital losses from Schedule D, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses				
d Net gain/loss reported on Form 4797, line 17, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses				
e Abandonment losses				
f Worthless stock losses (attach statement) . .				
g Other gain/loss on disposition of assets other than inventory				
24 Capital loss limitation and carryforward used				
25 Other income (loss) items with differences (attach statement)				
26 Total income (loss) items. Combine lines 1 through 25				
27 Total expense/deduction items (from Part III, line 39)				
28 Other items with no differences				
29 a Mixed groups, see instructions. All others, combine lines 26 through 28				
b PC insurance subgroup reconciliation totals				
c Life insurance subgroup reconciliation totals				
30 Reconciliation totals. Combine lines 29a through 29c				

Note: Line 30, column (a), must equal Part I, line 11, and column (d) must equal Form 1120, page 1, line 28.

Name of corporation (common parent, if consolidated return) Global Benefits Group Inc		Employer identification number 20-3842750
Check applicable box(es): (1) <input type="checkbox"/> Consolidated group (2) <input type="checkbox"/> Parent corp (3) <input type="checkbox"/> Consolidated eliminations (4) <input type="checkbox"/> Subsidiary corp (5) <input type="checkbox"/> Mixed 1120/L/PC group		
Check if a sub-consolidated: (6) <input type="checkbox"/> 1120 group (7) <input type="checkbox"/> 1120 eliminations		
Name of subsidiary (if consolidated return)		Employer identification number
Adjustments		

Part III Reconciliation of Net Income (Loss) per Income Statement of Includible Corporations With Taxable Income per Return - Expense/Deduction Items (see instructions)

Expense/Deduction Items	(a) Expense per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Deduction per Tax Return
1 U.S. current income tax expense				
2 U.S. deferred income tax expense				
3 State and local current income tax expense				
4 State and local deferred income tax expense				
5 Foreign current income tax expense (other than foreign withholding taxes)				
6 Foreign deferred income tax expense				
7 Foreign withholding taxes				
8 Interest expense (see instructions)				
9 Stock option expense				
10 Other equity-based compensation				
11 Meals and entertainment				
12 Fines and penalties				
13 Judgments, damages, awards, and similar costs				
14 Parachute payments				
15 Compensation with section 162(m) limitation				
16 Pension and profit-sharing				
17 Other post-retirement benefits				
18 Deferred compensation				
19 Charitable contribution of cash and tangible property				
20 Charitable contribution of intangible property				
21 Charitable contribution limitation/carryforward				
22 Domestic production activities deduction (see instructions)				
23 Current year acquisition or reorganization investment banking fees				
24 Current year acquisition or reorganization legal and accounting fees				
25 Current year acquisition/reorganization other costs				
26 Amortization/impairment of goodwill				
27 Amortization of acquisition, reorganization, and start-up costs				
28 Other amortization or impairment write-offs				
29 Reserved				
30 Depletion				
31 Depreciation				
32 Bad debt expense				
33 Corporate owned life insurance premiums				
34 Purchase versus lease (for purchasers and/or lessees)				
35 Research and development costs				
36 Section 118 exclusion (attach statement)				
37 Section 162(r) - FDIC premiums paid by certain large financial institutions (see instructions)				
38 Other expense/deduction items with differences (attach statement)				
39 Total expense/deduction items. Combine lines 1 through 38. Enter here and on Part II, line 27, reporting positive amounts as negative and negative amounts as positive				

Form **4562****Depreciation and Amortization**
(Including Information on Listed Property)

OMB No. 1545-0172

2022Attachment
Sequence No. **179**Department of the Treasury
Internal Revenue ServiceAttach to your tax return.
Go to www.irs.gov/Form4562 for instructions and the latest information.

Name(s) shown on return

Identifying number

Global Benefits Group Inc and Subs

20-3842750

Business or activity to which this form relates

General Depreciation & Amortization

Part I Election To Expense Certain Property Under Section 179**Note:** If you have any listed property, complete Part V before you complete Part I.

1	Maximum amount (see instructions)	1	
2	Total cost of section 179 property placed in service (see instructions)	2	
3	Threshold cost of section 179 property before reduction in limitation (see instructions)	3	
4	Reduction in limitation. Subtract line 3 from line 2. If zero or less, enter -0-	4	
5	Dollar limitation for tax year. Subtract line 4 from line 1. If zero or less, enter -0-. If married filing separately, see instructions.	5	
6	(a) Description of property	(b) Cost (business use only)	(c) Elected cost
7	Listed property. Enter the amount from line 29	7	
8	Total elected cost of section 179 property. Add amounts in column (c), lines 6 and 7	8	
9	Tentative deduction. Enter the smaller of line 5 or line 8	9	
10	Carryover of disallowed deduction from line 13 of your 2021 Form 4562	10	
11	Business income limitation. Enter the smaller of business income (not less than zero) or line 5. See instructions	11	
12	Section 179 expense deduction. Add lines 9 and 10, but don't enter more than line 11	12	
13	Carryover of disallowed deduction to 2023. Add lines 9 and 10, less line 12	13	

Note: Don't use Part II or Part III below for listed property. Instead, use Part V.**Part II Special Depreciation Allowance and Other Depreciation (Don't include listed property. See instructions.)**

14	Special depreciation allowance for qualified property (other than listed property) placed in service during the tax year. See instructions	14	1,668,233.
15	Property subject to section 168(f)(1) election	15	
16	Other depreciation (including ACRS)	16	581,204.

Part III MACRS Depreciation (Don't include listed property. See instructions.)**Section A**

17	MACRS deductions for assets placed in service in tax years beginning before 2022	17	19,923.
18	If you are electing to group any assets placed in service during the tax year into one or more general asset accounts, check here <input type="checkbox"/>		

Section B - Assets Placed in Service During 2022 Tax Year Using the General Depreciation System

(a) Classification of property	(b) Month and year placed in service	(c) Basis for depreciation (business/investment use only - see instructions)	(d) Recovery period	(e) Convention	(f) Method	(g) Depreciation deduction
19a 3-year property						
b 5-year property						
c 7-year property						
d 10-year property						
e 15-year property						
f 20-year property						
g 25-year property			25 yrs.		S/L	
h Residential rental property			27.5 yrs.	MM	S/L	
i Nonresidential real property			39 yrs.	MM	S/L	

Section C - Assets Placed in Service During 2022 Tax Year Using the Alternative Depreciation System

20a Class life					S/L	
b 12-year			12 yrs.		S/L	
c 30-year			30 yrs.	MM	S/L	
d 40-year			40 yrs.	MM	S/L	

Part IV Summary (See instructions.)

21	Listed property. Enter amount from line 28	21	
22	Total. Add amounts from line 12, lines 14 through 17, lines 19 and 20 in column (g), and line 21. Enter here and on the appropriate lines of your return. Partnerships and S corporations - see instructions.	22	2,269,360.
23	For assets shown above and placed in service during the current year, enter the portion of the basis attributable to section 263A costs	23	

For Paperwork Reduction Act Notice, see separate instructions.

Form **4562** (2022)

Form 4562 (2022)

Part V Listed Property (Include automobiles, certain other vehicles, certain aircraft, and property used for entertainment, recreation, or amusement.)**Note:** For any vehicle for which you are using the standard mileage rate or deducting lease expense, complete **only** 24a, 24b, columns (a) through (c) of Section A, all of Section B, and Section C if applicable.**Section A - Depreciation and Other Information** (Caution: See the instructions for limits for passenger automobiles.)**24a** Do you have evidence to support the business/investment use claimed? ☐ **Yes** ☐ **No** **24b** If "Yes," is the evidence written? ☐ **Yes** ☐ **No**

(a) Type of property (list vehicles first)	(b) Date placed in service	(c) Business/ investment use percentage	(d) Cost or other basis	(e) Basis for depreciation (business/investment use only)	(f) Recovery period	(g) Method/ Convention	(h) Depreciation deduction	(i) Elected section 179 cost
25 Special depreciation allowance for qualified listed property placed in service during the tax year and used more than 50% in a qualified business use. See instructions							25	
26 Property used more than 50% in a qualified business use:		%						
		%						
		%						
27 Property used 50% or less in a qualified business use:		%				S/L -		
		%				S/L -		
		%				S/L -		
28 Add amounts in column (h), lines 25 through 27. Enter here and on line 21, page 1.							28	
29 Add amounts in column (i), line 26. Enter here and on line 7, page 1.							29	

Section B - Information on Use of Vehicles

Complete this section for vehicles used by a sole proprietor, partner, or other "more than 5% owner," or related person. If you provided vehicles to your employees, first answer the questions in Section C to see if you meet an exception to completing this section for those vehicles.

	(a) Vehicle 1	(b) Vehicle 2	(c) Vehicle 3	(d) Vehicle 4	(e) Vehicle 5	(f) Vehicle 6
30 Total business/investment miles driven during the year (don't include commuting miles) . . .						
31 Total commuting miles driven during the year						
32 Total other personal (noncommuting) miles driven						
33 Total miles driven during the year. Add lines 30 through 32						
34 Was the vehicle available for personal use during off-duty hours?	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No
35 Was the vehicle used primarily by a more than 5% owner or related person?						
36 Is another vehicle available for personal use?						

Section C - Questions for Employers Who Provide Vehicles for Use by Their EmployeesAnswer these questions to determine if you meet an exception to completing Section B for vehicles used by employees who **aren't** more than 5% owners or related persons. See instructions.

	Yes	No
37 Do you maintain a written policy statement that prohibits all personal use of vehicles, including commuting, by your employees?		
38 Do you maintain a written policy statement that prohibits personal use of vehicles, except commuting, by your employees? See the instructions for vehicles used by corporate officers, directors, or 1% or more owners		
39 Do you treat all use of vehicles by employees as personal use?		
40 Do you provide more than five vehicles to your employees, obtain information from your employees about the use of the vehicles, and retain the information received?		
41 Do you meet the requirements concerning qualified automobile demonstration use? See instructions		

Note: If your answer to 37, 38, 39, 40, or 41 is "Yes," don't complete Section B for the covered vehicles.**Part VI Amortization**

(a) Description of costs	(b) Date amortization begins	(c) Amortizable amount	(d) Code section	(e) Amortization period or percentage	(f) Amortization for this year
42 Amortization of costs that begins during your 2022 tax year (see instructions):					
43 Amortization of costs that began before your 2022 tax year.				43	53,224.
44 Total. Add amounts in column (f). See the instructions for where to report				44	53,224.

Form **5471**

(Rev. December 2022)

Department of the Treasury
Internal Revenue Service**Information Return of U.S. Persons With Respect
to Certain Foreign Corporations**Go to www.irs.gov/Form5471 for instructions and the latest information.Information furnished for the foreign corporation's annual accounting period (tax year required by
section 898) (see instructions) beginning 01/01/2022 , and ending 12/31/2022

OMB No. 1545-0123

Attachment
Sequence No. **121**

Name of person filing this return

Global Benefits Group Inc

Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address)

27422 PORTOLA PARKWAY - SUITE 110

City or town, state, and ZIP code

FOOTHILL RANCH, CA 92610

Filer's tax year beginning 01/01/2022 , and ending 12/31/2022

D Check box if this is a final Form 5471 for the foreign corporation ☐**E** Check if any excepted specified foreign financial assets are reported on this form (see instructions). ☐**F** Check the box if this Form 5471 has been completed using "Alternative Information" under Rev. Proc. 2019-40 ☐**G** If the box on line F is checked, enter the corresponding code for "Alternative Information" (see instructions) ☐**H** Person(s) on whose behalf this information return is filed:

(1) Name	(2) Address	(3) Identifying number	(4) Check applicable box(es)		
			Shareholder	Officer	Director
GLOBAL BENEFITS GROUP, INC.	27422 PORTOLA PARKWAY, FOOTHILL RANCH CA 92610	20-3842750	X		

Important: Fill in all applicable lines and schedules. All information **must** be in English. All amounts **must** be stated in U.S. dollars unless otherwise indicated.

1a Name and address of foreign corporation SHANGHAI(GBG) ENTERPRISE MANAGEMENT CONSULTING Suite 2104. SCG Datang International 868 Yinghua Road SHANGAI, SHANGHAI 201204 CH				b(1) Employer identification number, if any	
				b(2) Reference ID number (see instructions) 3007707	
				c Country under whose laws incorporated CH	
d Date of incorporation	e Principal place of business	f Principal business activity code number	g Principal business activity	h Functional currency code	
12/01/2009	CH	541990	CONSULTANT	CNY	

2 Provide the following information for the foreign corporation's accounting period stated above.

a Name, address, and identifying number of branch office or agent (if any) in the United States	b If a U.S. income tax return was filed, enter:	
	(i) Taxable income or (loss)	(ii) U.S. income tax paid (after all credits)
c Name and address of foreign corporation's statutory or resident agent in country of incorporation	d Name and address (including corporate department, if applicable) of person (or persons) with custody of the books and records of the foreign corporation, and the location of such books and records, if different	

Schedule A Stock of the Foreign Corporation

(a) Description of each class of stock	(b) Number of shares issued and outstanding	
	(i) Beginning of annual accounting period	(ii) End of annual accounting period
COMMON	100.	100.

For Paperwork Reduction Act Notice, see instructions.

Form **5471** (Rev. 12-2022)

(a) Name, address, and identifying number of shareholder

Part II	Direct Shareholders of Foreign Corporation (see instructions)
----------------	--

Form **5471** (Rev. 12-2022)

Schedule C Income Statement (see instructions)

Important: Report all information in functional currency in accordance with U.S. generally accepted accounting principles (GAAP). Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules). However, if the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for dollar approximate separate transactions method (DASTM) corporations.

			Functional Currency	U.S. Dollars
Income	1a Gross receipts or sales	1a		
	b Returns and allowances	1b		
	c Subtract line 1b from line 1a	1c		
	2 Cost of goods sold	2		
	3 Gross profit (subtract line 2 from line 1c)	3		
	4 Dividends	4		
	5 Interest	5		
	6a Gross rents	6a		
	b Gross royalties and license fees	6b		
	7 Net gain or (loss) on sale of capital assets	7		
Deductions	8a Foreign currency transaction gain or loss - unrealized	8a		
	b Foreign currency transaction gain or loss - realized	8b		
	9 Other income (attach statement)	9		
	10 Total income (add lines 3 through 9)	10		
	11 Compensation not deducted elsewhere	11		
	12a Rents	12a		
	b Royalties and license fees	12b		
	13 Interest	13		
	14 Depreciation not deducted elsewhere	14		
	15 Depletion	15		
Net Income	16 Taxes (exclude income tax expense (benefit))	16		
	17 Other deductions (attach statement - exclude income tax expense (benefit))	17		
	18 Total deductions (add lines 11 through 17)	18		
	19 Net income or (loss) before unusual or infrequently occurring items, and income tax expense (benefit) (subtract line 18 from line 10)	19		
	20 Unusual or infrequently occurring items	20		
	21a Income tax expense (benefit) - current	21a		
Other Comprehensive Income	b Income tax expense (benefit) - deferred	21b		
	22 Current year net income or (loss) per books (combine lines 19 through 21b)	22		
	23a Foreign currency translation adjustments	23a		
	b Other	23b		
	c Income tax expense (benefit) related to other comprehensive income	23c		
	24 Other comprehensive income (loss), net of tax (line 23a plus line 23b less line 23c)	24		

Schedule F Balance Sheet**Important:** Report all amounts in U.S. dollars prepared and translated in accordance with U.S. GAAP. See instructions for an exception for DASTM corporations.

Assets		(a) Beginning of annual accounting period	(b) End of annual accounting period
1 Cash	1	235,833.	NONE
2a Trade notes and accounts receivable	2a	-21,609,818.	NONE
b Less allowance for bad debts	2b	() ()	
3 Derivatives	3		
4 Inventories	4		
5 Other current assets (attach statement). See Statement.36.	5	1,695,477.	NONE
6 Loans to shareholders and other related persons	6		
7 Investment in subsidiaries (attach statement). . . See Statement.36.	7	15,635.	NONE
8 Other investments (attach statement)	8		
9a Buildings and other depreciable assets	9a	7,960.	NONE
b Less accumulated depreciation.	9b	(4,799) ()	NONE
10a Depletable assets	10a		
b Less accumulated depletion	10b	() ()	
11 Land (net of any amortization)	11		
12 Intangible assets:			
a Goodwill	12a		
b Organization costs.	12b		
c Patents, trademarks, and other intangible assets	12c		
d Less accumulated amortization for lines 12a, 12b, and 12c	12d	() ()	
13 Other assets (attach statement) See Statement.36.	13	5,178,114.	NONE
14 Total assets	14	-14,481,598.	NONE
Liabilities and Shareholders' Equity			
15 Accounts payable	15	911,040.	NONE
16 Other current liabilities (attach statement) See Statement.36.	16	8,868,996.	NONE
17 Derivatives	17		
18 Loans from shareholders and other related persons	18		
19 Other liabilities (attach statement)	19		
20 Capital stock:			
a Preferred stock	20a		
b Common stock	20b		
21 Paid-in or capital surplus (attach reconciliation)	21		
22 Retained earnings	22	4,701,562.	NONE
23 Less cost of treasury stock	23	() ()	
24 Total liabilities and shareholders' equity	24	14,481,598.	NONE

Schedule G Other Information

	Yes	No
1 During the tax year, did the foreign corporation own at least a 10% interest, directly or indirectly, in any foreign partnership? If "Yes," see the instructions for required statement.		X
2 During the tax year, did the foreign corporation own an interest in any trust?		X
3 During the tax year, did the foreign corporation own any foreign entities that were disregarded as separate from their owner under Regulations sections 301.7701-2 and 301.7701-3 or did the foreign corporation own any foreign branches (see instructions)? If "Yes," you are generally required to attach Form 8858 for each entity or branch (see instructions).		X
4a During the tax year, did the filer pay or accrue any base erosion payment under section 59A(d) to the foreign corporation or did the filer have a base erosion tax benefit under section 59A(c)(2) with respect to a base erosion payment made or accrued to the foreign corporation (see instructions)? If "Yes," complete lines 4b and 4c.		X
b Enter the total amount of the base erosion payments. \$ _____		
c Enter the total amount of the base erosion tax benefit \$ _____		
5a During the tax year, did the foreign corporation pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? If "Yes," complete line 5b.		X
b Enter the total amount of the disallowed deductions (see instructions) \$ _____		

Schedule G Other Information (continued)

	Yes	No
6a Is the filer claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any transactions with the foreign corporation? If "Yes," complete lines 6b, 6c, and 6d. See instructions.		X
b Enter the amount of gross receipts derived from all sales of general property to the foreign corporation that the filer included in its computation of foreign-derived deduction eligible income (FDDEI) \$ _____		
c Enter the amount of gross income derived from a license of property to the foreign corporation that the filer included in its computation of FDDEI (see instructions) \$ _____		
d Enter the amount of gross income derived from services provided to the foreign corporation that the filer included in its computation of FDDEI (see instructions) \$ _____		
7 During the tax year, was the foreign corporation a participant in any cost sharing arrangement? If the answer to question 7 is "Yes," complete a separate Schedule G-1 for each cost sharing arrangement in which the foreign corporation was a participant during the tax year.		X
8 From April 25, 2014, to December 31, 2017, did the foreign corporation purchase stock or securities of a shareholder of the foreign corporation for use in a triangular reorganization (within the meaning of Regulations section 1.358-6(b)(2))?		X
9a Did the foreign corporation receive any intangible property in a prior year or the current tax year for which the U.S. transferor is required to report a section 367(d) annual income inclusion for the taxable year? If "Yes," go to line 9b.		X
b Enter in functional currency the amount of the earnings and profits reduction pursuant to section 367(d)(2)(B) for the tax year \$ _____		
10 During the tax year, was the foreign corporation an expatriated foreign subsidiary under Regulations section 1.7874-12(a)(9)? If "Yes," see instructions and attach statement.		X
11 During the tax year, did the foreign corporation participate in any reportable transaction as defined in Regulations section 1.6011-4? If "Yes," attach Form(s) 8886 if required by Regulations section 1.6011-4(c)(3)(i)(G).		X
12 During the tax year, did the foreign corporation pay or accrue any foreign tax that was disqualified for credit under section 901(m)?		X
13 During the tax year, did the foreign corporation pay or accrue foreign taxes to which section 909 applies, or treat foreign taxes that were previously suspended under section 909 as no longer suspended?		X
14 Did you answer "Yes" to any of the questions in the instructions for line 14? If "Yes," enter the corresponding code(s) from the instructions and attach statement _____		X
15 Does the foreign corporation have interest expense disallowed under section 163(j) (see instructions)? If "Yes," enter the amount \$ _____		X
16 Does the foreign corporation have previously disallowed interest expense under section 163(j) carried forward to the current tax year (see instructions)? If "Yes," enter the amount \$ _____		X
17a Did any extraordinary reduction with respect to a controlling section 245A shareholder occur during the tax year (see instructions)?		X
b If the answer to question 17a is "Yes," was an election made to close the tax year such that no amount is treated as an extraordinary reduction amount or tiered extraordinary reduction amount (see instructions)?		
18 Does the reporting corporation have any loan to or from the related party to which the safe-haven rate rules of Regulations section 1.482-2(a)(2)(iii)(B) are applicable, and for which the reporting corporation used a rate of interest within the safe-haven range of Regulations section 1.482-2(a)(2)(iii)(B)(1) (100% to 130% of the AFR for the relevant term)?		X
19a Did the reporting corporation make at least one distribution or acquisition (as defined by Regulations section 1.385-3) during the period including the tax year and the preceding 3 tax years, or, during the period beginning 36 months before the date of the respective distribution or acquisition and ending 36 months afterward, did the reporting corporation issue or refinance indebtedness owed to a related party?		X
b If the answer to question 19a is "Yes," provide the following. (1) The amount of such distribution(s) and acquisition(s) \$ _____ (2) The amount of such related party indebtedness \$ _____		

Schedule I Summary of Shareholder's Income From Foreign Corporation (see instructions)

If item H on page 1 is completed, a separate Schedule I must be filed for each Category 4, 5a, or 5b filer for whom reporting is furnished on this Form 5471. This Schedule I is being completed for:

Name of U.S. shareholder Global Benefits Group IncIdentifying number 20-3842750

1a	Section 964(e)(4) subpart F dividend income from the sale of stock of a lower-tier foreign corporation (see instructions)	1a	
b	Section 245A(e)(2) subpart F income from hybrid dividends of tiered corporations (see instructions) . . .	1b	
c	Subpart F income from tiered extraordinary disposition amounts not eligible for subpart F exception under section 954(c)(6)	1c	
d	Subpart F income from tiered extraordinary reduction amounts not eligible for subpart F exception under section 954(c)(6)	1d	
e	Section 954(c) Subpart F Foreign Personal Holding Company Income (enter result from Worksheet A) . .	1e	
f	Section 954(d) Subpart F Foreign Base Company Sales Income (enter result from Worksheet A)	1f	
g	Section 954(e) Subpart F Foreign Base Company Services Income (enter result from Worksheet A) . . .	1g	
h	Other subpart F income (enter result from Worksheet A)	1h	
2	Earnings invested in U.S. property (enter the result from Worksheet B)	2	
3	Reserved for future use	3	
4	Factoring income See instructions for reporting amounts on lines 1, 2, and 4 on your income tax return.	4	
5a	Section 245A eligible dividends (see instructions)	5a	
b	Extraordinary disposition amounts (see instructions)	5b	
c	Extraordinary reduction amounts (see instructions)	5c	
d	Section 245A(e) dividends (see instructions)	5d	
e	Dividends not reported on line 5a, 5b, 5c, or 5d	5e	
6	Exchange gain or (loss) on a distribution of previously taxed earnings and profits	6	

	Yes	No
7a Was any income of the foreign corporation blocked?		X
b Did any such income become unblocked during the tax year (see section 964(b))?		X
If the answer to either question is "Yes," attach an explanation.		
8a Did this U.S. shareholder have an extraordinary disposition (ED) account with respect to the foreign corporation at any time during the tax year (see instructions)?		X
b If the answer to question 8a is "Yes," enter the U.S. shareholder's ED account balance at the beginning of the CFC year \$ _____ and at the end of the tax year \$ _____. Provide an attachment detailing any changes from the beginning to the ending balances.		
c Enter the CFC's aggregate ED account balance with respect to all U.S. shareholders at the beginning of the CFC year \$ _____ and at the end of the tax year \$ _____. Provide an attachment detailing any changes from the beginning to the ending balances.		
9 Enter the sum of the hybrid deduction accounts with respect to stock of the foreign corporation (see instructions) \$ _____		

Form **5471** (Rev. 12-2022)

**SCHEDULE E
(Form 5471)**

(Rev. December 2021)

Department of the Treasury
Internal Revenue Service**Income, War Profits, and Excess Profits Taxes Paid or Accrued**

▶ Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471

Global Benefits Group Inc

Name of foreign corporation

SHANGHAI (GBG) ENTERPRISE MANAGEMENT CONSULTIN

Identifying number

20-3842750

Reference ID number (see instructions)

3007707

- a** Separate Category (Enter code - see instructions.) ▶ GEN
- b** If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions). ▶
- c** If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶

Part I Taxes for Which a Foreign Tax Credit Is Allowed**Section 1 - Taxes Paid or Accrued Directly by Foreign Corporation**

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Unsuspended Taxes	(d) Country or U.S. Possession to Which Tax Is Paid (Enter code - see instructions. Use a separate line for each.)	(e) Foreign Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)	(f) U.S. Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)
1	Shanghai (GBG) Enterprise Management Consulti			CH	2022/01/01	2022/12/31
2						
3						
4						

	(g) Income Subject to Tax in the Foreign Jurisdiction (see instructions)	(h) If taxes are paid on U.S. source income, check box	(i) Local Currency in Which Tax Is Payable (enter code - see instructions)	(j) Tax Paid or Accrued (in local currency in which the tax is payable)	(k) Conversion Rate to U.S. Dollars	(l) In U.S. Dollars (divide column (j) by column (k))	(m) In Functional Currency of Foreign Corporation
1	NONE		CNY	NONE	6.6334300	NONE	
2							
3							
4							
5	Total (combine lines 1 through 4 of column (l)). Also report amount on Schedule E-1, line 4 ▶					NONE	
6	Total (combine lines 1 through 4 of column (m)) ▶						

Section 2 - Taxes Deemed Paid by Foreign Corporation

	(a) Name of Lower-Tier Distributing Foreign Corporation	(b) EIN or Reference ID Number of Lower-Tier Distributing Foreign Corporation	(c) Country or U.S. Possession to Which Tax Is Paid (Enter code - see instructions. Use a separate line for each.)	(d) PTEP Group (enter code)	(e) Annual PTEP Account (enter year)
1					
2					
3					
4					

	(f) PTEP Distributed (enter amount in functional currency)	(g) Total Amount of PTEP in the PTEP Group (in functional currency)	(h) Total Amount of the PTEP Group Taxes With Respect to PTEP Group (USD)	(i) Foreign Income Taxes Properly Attributable to PTEP and not Previously Deemed Paid ((column (f)/column (g)) x column (h)) (USD)
1				
2				
3				
4				
5	Total (combine lines 1 through 4 of column (i)). Also report amount on Schedule E-1, line 6 ▶			

For Paperwork Reduction Act Notice, see instructions.

Schedule E (Form 5471) (Rev. 12-2021)

JSA

2X1666 2.000

0001W4 X45R

Name of foreign corporation SHANGHAI (GBG) ENTERPRISE MANAGEMENT CONSULTIN	EIN (if any)	Reference ID number (see instructions) 3007707
a Separate Category (Enter code-see instructions.)		▶ GEN
b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions)		▶
c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions)		▶

Part II Election

For tax years beginning after December 31, 2004, has an election been made under section 986(a)(1)(D) to translate taxes using the exchange rate on the date of payment?

☐ Yes ☒ No If "Yes," state date of election ▶
Part III Taxes for Which a Foreign Tax Credit Is Disallowed (Enter in functional currency of foreign corporation.)

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Section 901(j)	(d) Section 901(k) and (l)	(e) Section 901(m)	(f) U.S. Taxes	(g) Suspended Taxes	(h) Other	(i) Total
1									
2									
3	In functional currency (combine lines 1 and 2)								▶
4	In U.S. dollars (translated at the average exchange rate, as defined in section 989(b)(3) and related regulations (see instructions))								▶

Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Earnings and Profits (E&P) of Foreign Corporation**IMPORTANT:** Enter amounts in U.S. dollars.

		Taxes related to:			
		(a) Subpart F Income	(b) Tested Income	(c) Residual Income	(d) Suspended Taxes
1a	Balance at beginning of year (as reported in prior year Schedule E-1)	-0-	-0-	-0-	
b	Beginning balance adjustments (attach statement)				
c	Adjusted beginning balance (combine lines 1a and 1b)				
2	Adjustment for foreign tax redetermination				
3a	Taxes unsuspended under anti-splitter rules				
b	Taxes suspended under anti-splitter rules				
4	Taxes reported on Schedule E, Part I, Section 1, line 5, column (l)				
5	Taxes carried over in nonrecognition transactions				
6	Taxes reported on Schedule E, Part I, Section 2, line 5, column (i)				
7	Other adjustments (attach statement)				
8	Taxes paid or accrued on current income/E&P or accumulated E&P (combine lines 1c through 7)				
9	Taxes deemed paid with respect to inclusions (see instructions)				
10	Taxes deemed paid with respect to actual distributions				
11	Taxes on amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P				
12	Other (attach statement)				
13	Balance of taxes paid or accrued (combine lines 8 through 12 in columns (a), (b), and (c))				
14	Reserved for future use				
15	Reduction for other taxes not deemed paid				
16	Balance of taxes paid or accrued at the beginning of the next year. Line 16, columns (a), (b), and (c) must always equal zero. So, if necessary, enter negative amounts on line 15 of columns (a), (b), and (c) in amounts sufficient to reduce line 13, columns (a), (b), and (c) to zero. For the remaining columns, combine lines 8 through 12	-0-	-0-	-0-	

Schedule E (Form 5471) (Rev. 12-2021)

Page **3**

Name of foreign corporation	EIN (if any)	Reference ID number (see instructions)
SHANGHAI (GBG) ENTERPRISE MANAGEMENT CONSULTIN		3007707

- a** Separate Category (Enter code - see instructions.) **GEN**
- b** If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions)
- c** If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions)

Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Accumulated Earnings and Profits (E&P) of Foreign Corporation (continued)

(e) Taxes related to previously taxed E&P (see instructions)

	(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP
1a										
b										
c										
2										
3a										
b										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										

Schedule E (Form 5471) (Rev. 12-2021)

Document Page 74 of 322
Current Earnings and ProfitsSCHEDULE H
(Form 5471)(Rev. December 2021)
Department of the Treasury
Internal Revenue Service

▶ Attach to Form 5471.

OMB No. 1545-0123

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

SHANGHAI (GBG) ENTERPRISE MANAGEMENT CONSULTIN

EIN (if any)

Reference ID number (see instructions)

3007707

IMPORTANT: Enter the amounts on lines 1 through 5c in **functional** currency.

1	Current year net income or (loss) per foreign books of account.		1
2	Net adjustments made to line 1 to determine current earnings and profits according to U.S. financial and tax accounting standards (see instructions):	Net Additions	Net Subtractions
a	Capital gains or losses.	2a	
b	Depreciation and amortization.	2b	
c	Depletion.	2c	
d	Investment or incentive allowance.	2d	
e	Charges to statutory reserves.	2e	
f	Inventory adjustments.	2f	
g	Income taxes (see Schedule E, Part I, Section 1, line 6, column (m), and Part III, line 3, column (i)).	2g	
h	Foreign currency gains or losses.	2h	
i	Other (attach statement).	2i	
3	Total net additions.	3	
4	Total net subtractions.	4	
5a	Current earnings and profits (line 1 plus line 3 minus line 4).	5a	
b	DASTM gain or (loss) for foreign corporations that use DASTM (see instructions).	5b	
c	Combine lines 5a and 5b and enter the result on line 5c. Then enter on lines 5c(i), 5c(ii), and 5c(iii)(A) through 5c(iii)(D) the portion of the line 5c amount with respect to the categories of income shown on those lines.	5c	
(i)	General category (enter amount on applicable Schedule J, Part I, line 3, column (a)).	5c(i)	
(ii)	Passive category (enter amount on applicable Schedule J, Part I, line 3, column (a)).	5c(ii)	
(iii)	Section 901(j) category:		
(A)	Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(A) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(A)	
(B)	Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(B) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(B)	
(C)	Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(C) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(C)	
(D)	Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(D) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(D)	
d	Current earnings and profits in U.S. dollars (line 5c translated at the average exchange rate, as defined in section 989(b)(3) and the related regulations (see instructions)).	5d	
e	Enter exchange rate used for line 5d. ▶ _____		

For Paperwork Reduction Act Notice, see instructions.

Schedule H (Form 5471) (Rev. 12-2021)

**SCHEDULE I-1
(Form 5471)**

(Rev. December 2021)

Department of the Treasury
Internal Revenue Service

Information for Global Intangible Low-Taxed Income

► **Attach to Form 5471.**

► **Go to www.irs.gov/Form5471 for instructions and the latest information.**

OMB No. 1545-0123

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

SHANGHAI (GBG) ENTERPRISE MANAGEMENT CONSULTIN

EIN (if any)

Reference ID number (see instructions)

3007707

Separate Category (Enter code - see instructions.)

► GEN

		Functional Currency	Conversion Rate	U.S. Dollars
1 Gross income (see instructions if cost of goods sold exceed gross receipts)	1			
2 Exclusions (see instructions if cost of goods sold exceed gross receipts)				
a Effectively connected income	2a			
b Subpart F income	2b			
c High-tax exception income per section 954(b)(4)	2c			
d Related party dividends	2d			
e Foreign oil and gas extraction income	2e			
3 Total exclusions (combine lines 2a through 2e)	3			
4 Gross income less total exclusions (line 1 minus line 3) (see instructions)	4			
5 Deductions properly allocable to amount on line 4	5			
6 Tested income (loss) (line 4 minus line 5) (see instructions)	6			
7 Tested foreign income taxes	7			
8 Qualified business asset investment (QBAI)	8			
9a Interest expense included on line 5	9a			
b Qualified interest expense	9b			
c Tested loss QBAI amount	9c			
d Tested interest expense (line 9a minus the sum of line 9b and line 9c). If zero or less, enter -0-	9d			
10a Interest income included in line 4	10a			
b Qualified interest income	10b			
c Tested interest income (line 10a minus line 10b). If zero or less, enter -0-	10c			

For Paperwork Reduction Act Notice, see instructions.

Schedule I-1 (Form 5471) (Rev. 12-2021)

**SCHEDULE J
(Form 5471)**(Rev. December 2020)
Department of the Treasury
Internal Revenue Service**Accumulated Earnings & Profits (E&P) of Controlled Foreign Corporation**▶ **Attach to Form 5471.**▶ **Go to www.irs.gov/Form5471 for instructions and the latest information.**

OMB No. 1545-0123

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

SHANGHAI (GBG) ENTERPRISE MANAGEMENT CONSULTIN

EIN (if any)

Reference ID number (see instructions)

3007707

a Separate Category (Enter code - see instructions.) ▶ GEN**b** If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶**Part I Accumulated E&P of Controlled Foreign Corporation**☐ Check the box if person filing return does not have all U.S. shareholders' information to complete an amount in column (e) (see instructions).**Important:** Enter amounts in functional currency.

		(a) Post-2017 E&P Not Previously Taxed (post-2017 section 959(c)(3) balance)	(b) Post-1986 Undistributed Earnings (post-1986 and pre-2018 section 959(c)(3) balance)	(c) Pre-1987 E&P Not Previously Taxed (pre-1987 section 959(c)(3) balance)	(d) Hovering Deficit and Deduction for Suspended Taxes	(e) Previously Taxed E&P (see instructions)	
						(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP
1a	Balance at beginning of year (as reported on prior year Schedule J)	-12,469,173.					
b	Beginning balance adjustments (attach statement)						
c	Adjusted beginning balance (combine lines 1a and 1b)	-12,469,173.					
2a	Reduction for taxes unsuspended under anti-splitter rules						
b	Disallowed deduction for taxes suspended under anti-splitter rules						
3	Current year E&P (or deficit in E&P) (enter amount from applicable line 5c of Schedule H)						
4	E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation						
5a	E&P carried over in nonrecognition transaction						
b	Reclassify deficit in E&P as hovering deficit after nonrecognition transaction						
6	Other adjustments (attach statement)						
7	Total current and accumulated E&P (combine lines 1c through 6)	-12,469,173.					
8	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P						
9	Actual distributions						
10	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P						
11	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)						
12	Other adjustments (attach statement)						
13	Hovering deficit offset of undistributed post-transaction E&P (see instructions)						
14	Balance at beginning of next year (combine lines 7 through 13)	-12,469,173.					

For Paperwork Reduction Act Notice, see the Instructions for Form 5471.**Schedule J (Form 5471) (Rev. 12-2020)**

Part I Accumulated E&P of Controlled Foreign Corporation (continued)

	(e) Previously Taxed E&P (see instructions)				
	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP
1 a					
b					
c					
2 a					
b					
3					
4					
5 a					
b					
6					
7					
8					
9					
10					
11					
12					
13					
14					

	(e) Previously Taxed E&P (see instructions)			(f)
	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP	Total Section 964(a) E&P (combine columns (a), (b), (c), and (e)(i) through (e)(x))
1 a				-12,469,173.
b				
c				-12,469,173.
2 a				
b				
3				
4				
5 a				
b				
6				
7				-12,469,173.
8				
9				
10				
11				
12				
13				
14				-12,469,173.

Part II **Nonpreviously Taxed E&P Subject to Recapture as Subpart F Income (section 952(c)(2))**

Important: Enter amounts in functional currency.

1	Balance at beginning of year	▶	1	
2	Additions (amounts subject to future recapture).	▶	2	
3	Subtractions (amounts recaptured in current year)	▶	3	
4	Balance at end of year (combine lines 1 through 3)	▶	4	

Schedule J (Form 5471) (Rev. 12-2020)

SCHEDULE M
(Form 5471)(Rev. December 2021)
Department of the Treasury
Internal Revenue Service**Transactions Between Controlled Foreign Corporation
and Shareholders or Other Related Persons**

OMB No. 1545-0123

▶ Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471

Identifying number

Global Benefits Group Inc

20-3842750

Name of foreign corporation

EIN (if any)

Reference ID number (see instructions)

SHANGHAI (GBG) ENTERPRISE MANAGEMENT CONSULTIN

3007707

Important: Complete a **separate** Schedule M for each controlled foreign corporation. Enter the totals for each type of transaction that occurred during the annual accounting period between the foreign corporation and the persons listed in columns (b) through (f). All amounts must be stated in U.S. dollars translated from functional currency at the average exchange rate for the foreign corporation's tax year. See instructions.

Enter the relevant functional currency and the exchange rate used throughout this schedule ▶

CNY

(a) Transactions of foreign corporation	(b) U.S. person filing this return	(c) Any domestic corporation or partnership controlled by U.S. person filing this return	(d) Any other foreign corporation or partnership controlled by U.S. person filing this return	(e) 10% or more U.S. shareholder of controlled foreign corporation (other than the U.S. person filing this return)	(f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation
1 Sales of stock in trade (inventory)					
2 Sales of tangible property other than stock in trade					
3 Sales of property rights (patents, trademarks, etc.).					
4 Platform contribution transaction payments received					
5 Cost sharing transaction payments received					
6 Compensation received for technical, managerial, engineering, construction, or like services . .					
7 Commissions received					
8 Rents, royalties, and license fees received					
9 Hybrid dividends received (see instructions)					
10 Dividends received (exclude hybrid dividends, deemed distributions under subpart F, and distributions of previously taxed income)					
11 Interest received.					
12 Premiums received for insurance or reinsurance.					
13 Loan guarantee fees received .					
14 Other amounts received (attach statement)					
15 Add lines 1 through 14					
16 Purchases of stock in trade (inventory)					
17 Purchases of tangible property other than stock in trade. . . .					
18 Purchases of property rights (patents, trademarks, etc.) . . .					
19 Platform contribution transaction payments paid					
20 Cost sharing transaction payments paid .					
21 Compensation paid for technical, managerial, engineering, construction, or like services . .					
22 Commissions paid					
23 Rents, royalties, and license fees paid					
24 Hybrid dividends paid (see instructions)					
25 Dividends paid (exclude hybrid dividends paid)					
26 Interest paid					
27 Premiums paid for insurance or reinsurance					
28 Loan guarantee fees paid . . .					
29 Other amounts paid (attach statement). .					
30 Add lines 16 through 29. . . .					

For Paperwork Reduction Act Notice, see the Instructions for Form 5471.

Schedule M (Form 5471) (Rev. 12-2021)

Schedule M (Form 5471) (Rev. 12-2021)

Page 2

Name of person filing Form 5471

Identifying number

(a) Transactions of foreign corporation	(b) U.S. person filing this return	(c) Any domestic corporation or partnership controlled by U.S. person filing this return	(d) Any other foreign corporation or partnership controlled by U.S. person filing this return	(e) 10% or more U.S. shareholder of controlled foreign corporation (other than the U.S. person filing this return)	(f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation
31 Accounts Payable					
32 Amounts borrowed (enter the maximum loan balance during the year) - see instructions					
33 Accounts Receivable					
34 Amounts loaned (enter the maximum loan balance during the year) - see instructions					

Schedule M (Form 5471) (Rev. 12-2021)

**SCHEDULE P
(Form 5471)**

(Rev. December 2020)

Department of the Treasury
Internal Revenue Service**Previously Taxed Earnings and Profits of U.S. Shareholder
of Certain Foreign Corporations**

▶ Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of U.S. shareholder

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

SHANGHAI (GBG) ENTERPRISE MANAGEMENT CONSULTIN

EIN (if any)

Reference ID number (see instructions)

3007707

a Separate Category (Enter code - see instructions.) ▶

GEN

b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶

Part I Previously Taxed E&P in Functional Currency (see instructions)

		(a) Reclassified section 965(a) PTEP	(b) Reclassified section 965(b) PTEP	(c) General section 959(c)(1) PTEP
1a	Balance at beginning of year (see instructions)			
b	Beginning balance adjustments (attach statement)			
c	Adjusted beginning balance (combine lines 1a and 1b)			
2	Reduction for taxes unsuspended under anti-splitter rules			
3	Previously taxed E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation			
4	Previously taxed E&P carried over in nonrecognition transaction			
5	Other adjustments (attach statement)			
6	Total previously taxed E&P (combine lines 1c through 5)			
7	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P			
8	Actual distributions of previously taxed E&P			
9	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P			
10	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)			
11	Other adjustments (attach statement)			
12	Balance at beginning of next year (combine lines 6 through 11)			

For Paperwork Reduction Act Notice, see instructions.

Schedule P (Form 5471) (Rev. 12-2020)

Part I **Previously Taxed E&P in Functional Currency** (see instructions) *(continued)*

	(d) Reclassified section 951A PTEP	(e) Reclassified section 245A(d) PTEP	(f) Section 965(a) PTEP	(g) Section 965(b) PTEP	(h) Section 951A PTEP	(i) Section 245A(d) PTEP	(j) Section 951(a)(1)(A) PTEP	(k) Total
1a								
b								
c								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								

Part II Previously Taxed E&P in U.S. Dollars

		(a) Reclassified section 965(a) PTEP	(b) Reclassified section 965(b) PTEP	(c) General section 959(c)(1) PTEP
1 a	Balance at beginning of year (see instructions)			
b	Beginning balance adjustments (attach statement)			
c	Adjusted beginning balance (combine lines 1a and 1b)			
2	Reduction for taxes unsuspended under anti-splitter rules			
3	Previously taxed E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation			
4	Previously taxed E&P carried over in nonrecognition transaction			
5	Other adjustments (attach statement)			
6	Total previously taxed E&P (combine lines 1c through 5)			
7	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P			
8	Actual distributions of previously taxed E&P			
9	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P			
10	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)			
11	Other adjustments (attach statement)			
12	Balance at beginning of next year (combine lines 6 through 11)			

Schedule P (Form 5471) (Rev. 12-2020)

Part II Previously Taxed E&P in U.S. Dollars *(continued)*

	(d) Reclassified section 951A PTEP	(e) Reclassified section 245A(d) PTEP	(f) Section 965(a) PTEP	(g) Section 965(b) PTEP	(h) Section 951A PTEP	(i) Section 245A(d) PTEP	(j) Section 951(a)(1)(A) PTEP	(k) Total
1a								
b								
c								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								

Schedule P (Form 5471) (Rev. 12-2020)

SCHEDULE Q
(Form 5471)(Rev. December 2022)
Department of the Treasury
Internal Revenue Service**CFC Income by CFC Income Groups**

Attach to Form 5471.

Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

SHANGHAI (GBG) ENTERPRISE MANAGEMENT CONSULTIN

EIN (if any)

Reference ID number (see instructions)

3007707

Complete a separate Schedule Q with respect to each applicable category of income (see instructions).

A Enter separate category code with respect to which this Schedule Q is being completed (see instructions for codes) GEN**B** If category code "PAS" is entered on line A, enter the applicable grouping code (see instructions)**C** If code "901j" is entered on line A, enter the country code for the sanctioned country (see instructions)

Complete a separate Schedule Q for U.S. source income and foreign source income (see instructions for an exception).

D Indicate whether this Schedule Q is being completed for: ☐ U.S. source income or ☒ Foreign source income

Complete a separate Schedule Q for FOGEI or FORI income.

E If this Schedule Q is being completed for FOGEI or FORI income, check this box ☐Enter amounts in functional currency
of the foreign corporation (unless
otherwise noted).

	(i) Country Code	(ii) Gross Income	(iii) Definitely Related Expenses	(iv) Related Person Interest Expense	(v) Other Interest Expense	(vi) Research & Experimental Expenses	(vii) Other Expenses (attach schedule)
1 Subpart F Income Groups							
a Dividends, Interest, Rents, Royalties, & Annuities (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
b Net Gain From Certain Property Transactions (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
c Net Gain From Commodities Transactions (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
d Net Foreign Currency Gain (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
e Income Equivalent to Interest (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
f Other							
(1) Unit name: _____							
(2) Unit name: _____							
g Foreign Base Company Sales Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							

Important: See **Computer-Generated Schedule Q** in instructions.

For Paperwork Reduction Act Notice, see instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

JSA

2X1650 3.000

0001W4 X45R

Schedule Q (Form 5471) (Rev. 12-2022)

Page **2**

	(viii) Current Year Tax on Reattributed Income From Disregarded Payments	(ix) Current Year Tax on All Other Disregarded Payments	(x) Other Current Year Taxes	(xi) Net Income (column (ii) less columns (iii) through (x))	(xii) Foreign Taxes for Which Credit Allowed (U.S. Dollars)	(xiii) Average Asset Value	(xiv) High Tax Election	(xv) Loss Allocation	(xvi) Net Income After Loss Allocation (column (xi) minus column (xv))
1									
a									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
b									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
c									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
d									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
e									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
f									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
g									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		

Important: See **Computer-Generated Schedule Q** in instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

Schedule Q (Form 5471) (Rev. 12-2022)

Page **3**

Enter amounts in functional currency of the foreign corporation (unless otherwise noted).

	(i) Country Code	(ii) Gross Income	(iii) Definitely Related Expenses	(iv) Related Person Interest Expense	(v) Other Interest Expense	(vi) Research & Experimental Expenses	(vii) Other Expenses (attach schedule)
1 Subpart F Income Groups							
h Foreign Base Company Services Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
i Full Inclusion Foreign Base Company Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
j Insurance Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
k International Boycott Income							
l Bribes, Kickbacks, and Other Payments							
m Section 901(j) income							
2 Recaptured Subpart F Income							
3 Tested Income Group (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
4 Residual Income Group (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
5 Total							

Important: See **Computer-Generated Schedule Q** in instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

Schedule Q (Form 5471) (Rev. 12-2022)

Page **4**

	(viii) Current Year Tax on Reattributed Income From Disregarded Payments	(ix) Current Year Tax on All Other Disregarded Payments	(x) Other Current Year Taxes	(xi) Net Income (column (ii) less columns (iii) through (x))	(xii) Foreign Taxes for Which Credit Allowed (U.S. Dollars)	(xiii) Average Asset Value	(xiv) High Tax Election	(xv) Loss Allocation	(xvi) Net Income After Loss Allocation (column (xi) minus column (xv))
1									
h									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
i									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
j									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
k									
l									
m									
2									
3									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
4									
(1)									
(2)									
5									

Important: See **Computer-Generated Schedule Q** in instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

**SCHEDULE R
(Form 5471)**

(December 2020)
Department of the Treasury
Internal Revenue Service

Distributions From a Foreign Corporation

► Attach to Form 5471.

OMB No. 1545-0123

► Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471		Identifying number
Global Benefits Group Inc		20-3842750
Name of foreign corporation	EIN (if any)	Reference ID number (see instructions)
SHANGHAI (GBG) ENTERPRISE MANAGEMENT CONSULTIN		3007707

	(a) Description of distribution	(b) Date of distribution	(c) Amount of distribution in foreign corporation's functional currency	(d) Amount of E&P distribution in foreign corporation's functional currency
1	No Distributions	12/31/2022	NONE	NONE
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				

Form **5471**

(Rev. December 2022)

Department of the Treasury
Internal Revenue Service**Information Return of U.S. Persons With Respect
to Certain Foreign Corporations**Go to www.irs.gov/Form5471 for instructions and the latest information.Information furnished for the foreign corporation's annual accounting period (tax year required by
section 898) (see instructions) beginning 01/01/2022 , and ending 12/31/2022

OMB No. 1545-0123

Attachment
Sequence No. **121**

Name of person filing this return

Global Benefits Group Inc

Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address)

27422 PORTOLA PARKWAY - SUITE 110

City or town, state, and ZIP code

FOOTHILL RANCH, CA 92610

Filer's tax year beginning 01/01/2022 , and ending 12/31/2022

D Check box if this is a final Form 5471 for the foreign corporation ☐**E** Check if any excepted specified foreign financial assets are reported on this form (see instructions). ☐**F** Check the box if this Form 5471 has been completed using "Alternative Information" under Rev. Proc. 2019-40 ☐**G** If the box on line F is checked, enter the corresponding code for "Alternative Information" (see instructions) ☐**H** Person(s) on whose behalf this information return is filed:

(1) Name	(2) Address	(3) Identifying number	(4) Check applicable box(es)		
			Shareholder	Officer	Director
GLOBAL BENEFITS GROUP, INC.	27422 PORTOLA PARKWAY, FOOTHILL RANCH 92610 CA	20-3842750	X		

Important: Fill in all applicable lines and schedules. All information **must** be in English. All amounts **must** be stated in U.S. dollars unless otherwise indicated.

1a Name and address of foreign corporation				b(1) Employer identification number, if any	
GBG SERVICES (INDIA) PRIVATE LIMITED					
ASCENT TOWERS, 4TH FLOOR ROAD 10				b(2) Reference ID number (see instructions)	
BANJARA HILLS, HYDERABAD 500034 IN				541990	
				c Country under whose laws incorporated	
				IN	
d Date of incorporation	e Principal place of business	f Principal business activity code number	g Principal business activity	h Functional currency code	
10/16/2010	IN	541990	CONSULTANT	INR	

2 Provide the following information for the foreign corporation's accounting period stated above.

a Name, address, and identifying number of branch office or agent (if any) in the United States	b If a U.S. income tax return was filed, enter:	
	(i) Taxable income or (loss)	(ii) U.S. income tax paid (after all credits)
c Name and address of foreign corporation's statutory or resident agent in country of incorporation	d Name and address (including corporate department, if applicable) of person (or persons) with custody of the books and records of the foreign corporation, and the location of such books and records, if different	

Schedule A Stock of the Foreign Corporation

(a) Description of each class of stock	(b) Number of shares issued and outstanding	
	(i) Beginning of annual accounting period	(ii) End of annual accounting period
COMMON	74.	74.

For Paperwork Reduction Act Notice, see instructions.

Form **5471** (Rev. 12-2022)

(a) Name, address, and identifying number of shareholder

(c) Number of shares held at beginning of annual accounting period	
--	--

(d) Number of shares held at end of annual accounting period	
--	--

(e) Pro rata share
of subpart F
income (enter as
a percentage)

COMMON STOCK

74.

74.

100.00000000000000

(a) Name, address, and identifying number of shareholder.
Also, include country of incorporation
or formation, if applicable.

(c) Number of shares held at beginning of annual accounting period	
--	--

(d) Number of shares held at end of annual accounting period

COMMON STOCK

74.

74.

Schedule C Income Statement (see instructions)

Important: Report all information in functional currency in accordance with U.S. generally accepted accounting principles (GAAP). Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules). However, if the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for dollar approximate separate transactions method (DASTM) corporations.

			Functional Currency	U.S. Dollars
Income	1a Gross receipts or sales	1a	179,387,876.	2,282,614.
	b Returns and allowances	1b		
	c Subtract line 1b from line 1a	1c	179,387,876.	2,282,614.
	2 Cost of goods sold	2		
	3 Gross profit (subtract line 2 from line 1c)	3	179,387,876.	2,282,614.
	4 Dividends	4		
	5 Interest	5	119,926.	1,526.
	6a Gross rents	6a		
	b Gross royalties and license fees	6b		
	7 Net gain or (loss) on sale of capital assets	7		
Deductions	8a Foreign currency transaction gain or loss - unrealized	8a		
	b Foreign currency transaction gain or loss - realized	8b	-9,830,904.	-125,093.
	9 Other income (attach statement)	9		
	10 Total income (add lines 3 through 9)	10	169,676,898.	2,159,047.
	11 Compensation not deducted elsewhere	11	122,222,572.	1,555,216.
	12a Rents	12a	12,142,120.	154,502.
	b Royalties and license fees	12b		
	13 Interest	13		
	14 Depreciation not deducted elsewhere	14	-1,968,334.	-25,046.
	15 Depletion	15		
Net Income	16 Taxes (exclude income tax expense (benefit))	16		
	17 Other deductions (attach statement - exclude income tax expense (benefit)). See Statement 38	17	25,737,863.	327,500.
	18 Total deductions (add lines 11 through 17)	18	158,134,221.	2,012,172.
	19 Net income or (loss) before unusual or infrequently occurring items, and income tax expense (benefit) (subtract line 18 from line 10) . .	19	11,542,677.	146,874.
	20 Unusual or infrequently occurring items	20		
Net Income	21a Income tax expense (benefit) - current. . See Statement 38	21a	3,269,651.	41,605.
	b Income tax expense (benefit) - deferred	21b		
	22 Current year net income or (loss) per books (combine lines 19 through 21b) .	22	8,273,026.	105,270.
Other Comprehensive Income	23a Foreign currency translation adjustments	23a		
	b Other	23b		
	c Income tax expense (benefit) related to other comprehensive income	23c		
	24 Other comprehensive income (loss), net of tax (line 23a plus line 23b less line 23c).	24		

Form 5471 (Rev. 12-2022)

Schedule F Balance Sheet**Important:** Report all amounts in U.S. dollars prepared and translated in accordance with U.S. GAAP. See instructions for an exception for DASTM corporations.

Assets		(a) Beginning of annual accounting period	(b) End of annual accounting period
1 Cash	1	586,448.	338,901.
2a Trade notes and accounts receivable	2a		
b Less allowance for bad debts	2b	() ()	
3 Derivatives	3		
4 Inventories	4		
5 Other current assets (attach statement). See Statement 39.	5	532,585.	1,998,890.
6 Loans to shareholders and other related persons	6		
7 Investment in subsidiaries (attach statement).	7		
8 Other investments (attach statement)	8		
9a Buildings and other depreciable assets	9a	335,736.	1,395,253.
b Less accumulated depreciation.	9b	(301,873.) (286,225)	
10a Depletable assets	10a		
b Less accumulated depletion	10b	() ()	
11 Land (net of any amortization)	11		
12 Intangible assets:			
a Goodwill	12a		
b Organization costs.	12b		
c Patents, trademarks, and other intangible assets	12c		
d Less accumulated amortization for lines 12a, 12b, and 12c	12d	() ()	
13 Other assets (attach statement) See Statement 39.	13	1,113,734.	NONE
14 Total assets	14	2,266,630.	3,446,819.
Liabilities and Shareholders' Equity			
15 Accounts payable	15	24,728.	29,001.
16 Other current liabilities (attach statement) See Statement 39.	16	679,333.	1,749,979.
17 Derivatives	17		
18 Loans from shareholders and other related persons	18		
19 Other liabilities (attach statement) See Statement 39.	19	NONE	1.
20 Capital stock:			
a Preferred stock	20a		
b Common stock	20b	2,010.	2,010.
21 Paid-in or capital surplus (attach reconciliation)	21	25,868.	25,868.
22 Retained earnings	22	1,534,691.	1,639,960.
23 Less cost of treasury stock	23	() ()	
24 Total liabilities and shareholders' equity	24	2,266,630.	3,446,819.

Schedule G Other Information

	Yes	No
1 During the tax year, did the foreign corporation own at least a 10% interest, directly or indirectly, in any foreign partnership? If "Yes," see the instructions for required statement.		X
2 During the tax year, did the foreign corporation own an interest in any trust?		X
3 During the tax year, did the foreign corporation own any foreign entities that were disregarded as separate from their owner under Regulations sections 301.7701-2 and 301.7701-3 or did the foreign corporation own any foreign branches (see instructions)? If "Yes," you are generally required to attach Form 8858 for each entity or branch (see instructions).		X
4a During the tax year, did the filer pay or accrue any base erosion payment under section 59A(d) to the foreign corporation or did the filer have a base erosion tax benefit under section 59A(c)(2) with respect to a base erosion payment made or accrued to the foreign corporation (see instructions)? If "Yes," complete lines 4b and 4c.		X
b Enter the total amount of the base erosion payments. \$ _____		
c Enter the total amount of the base erosion tax benefit \$ _____		
5a During the tax year, did the foreign corporation pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? If "Yes," complete line 5b.		X
b Enter the total amount of the disallowed deductions (see instructions) \$ _____		

Schedule G Other Information (continued)

	Yes	No
6a Is the filer claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any transactions with the foreign corporation? If "Yes," complete lines 6b, 6c, and 6d. See instructions.		X
b Enter the amount of gross receipts derived from all sales of general property to the foreign corporation that the filer included in its computation of foreign-derived deduction eligible income (FDDEI) \$ _____		
c Enter the amount of gross income derived from a license of property to the foreign corporation that the filer included in its computation of FDDEI (see instructions) \$ _____		
d Enter the amount of gross income derived from services provided to the foreign corporation that the filer included in its computation of FDDEI (see instructions) \$ _____		
7 During the tax year, was the foreign corporation a participant in any cost sharing arrangement? If the answer to question 7 is "Yes," complete a separate Schedule G-1 for each cost sharing arrangement in which the foreign corporation was a participant during the tax year.		X
8 From April 25, 2014, to December 31, 2017, did the foreign corporation purchase stock or securities of a shareholder of the foreign corporation for use in a triangular reorganization (within the meaning of Regulations section 1.358-6(b)(2))?		X
9a Did the foreign corporation receive any intangible property in a prior year or the current tax year for which the U.S. transferor is required to report a section 367(d) annual income inclusion for the taxable year? If "Yes," go to line 9b.		X
b Enter in functional currency the amount of the earnings and profits reduction pursuant to section 367(d)(2)(B) for the tax year \$ _____		
10 During the tax year, was the foreign corporation an expatriated foreign subsidiary under Regulations section 1.7874-12(a)(9)? If "Yes," see instructions and attach statement.		X
11 During the tax year, did the foreign corporation participate in any reportable transaction as defined in Regulations section 1.6011-4? If "Yes," attach Form(s) 8886 if required by Regulations section 1.6011-4(c)(3)(i)(G).		X
12 During the tax year, did the foreign corporation pay or accrue any foreign tax that was disqualified for credit under section 901(m)?		X
13 During the tax year, did the foreign corporation pay or accrue foreign taxes to which section 909 applies, or treat foreign taxes that were previously suspended under section 909 as no longer suspended?		X
14 Did you answer "Yes" to any of the questions in the instructions for line 14? If "Yes," enter the corresponding code(s) from the instructions and attach statement _____		X
15 Does the foreign corporation have interest expense disallowed under section 163(j) (see instructions)? If "Yes," enter the amount \$ _____		X
16 Does the foreign corporation have previously disallowed interest expense under section 163(j) carried forward to the current tax year (see instructions)? If "Yes," enter the amount \$ _____		X
17a Did any extraordinary reduction with respect to a controlling section 245A shareholder occur during the tax year (see instructions)?		X
b If the answer to question 17a is "Yes," was an election made to close the tax year such that no amount is treated as an extraordinary reduction amount or tiered extraordinary reduction amount (see instructions)?		
18 Does the reporting corporation have any loan to or from the related party to which the safe-haven rate rules of Regulations section 1.482-2(a)(2)(iii)(B) are applicable, and for which the reporting corporation used a rate of interest within the safe-haven range of Regulations section 1.482-2(a)(2)(iii)(B)(1) (100% to 130% of the AFR for the relevant term)?		X
19a Did the reporting corporation make at least one distribution or acquisition (as defined by Regulations section 1.385-3) during the period including the tax year and the preceding 3 tax years, or, during the period beginning 36 months before the date of the respective distribution or acquisition and ending 36 months afterward, did the reporting corporation issue or refinance indebtedness owed to a related party?		X
b If the answer to question 19a is "Yes," provide the following. (1) The amount of such distribution(s) and acquisition(s) \$ _____ (2) The amount of such related party indebtedness \$ _____		

Schedule I Summary of Shareholder's Income From Foreign Corporation (see instructions)

If item H on page 1 is completed, a separate Schedule I must be filed for each Category 4, 5a, or 5b filer for whom reporting is furnished on this Form 5471. This Schedule I is being completed for:

Name of U.S. shareholder Global Benefits Group Inc

Identifying number 20-3842750

1a	Section 964(e)(4) subpart F dividend income from the sale of stock of a lower-tier foreign corporation (see instructions)	1a	
b	Section 245A(e)(2) subpart F income from hybrid dividends of tiered corporations (see instructions) . . .	1b	
c	Subpart F income from tiered extraordinary disposition amounts not eligible for subpart F exception under section 954(c)(6)	1c	
d	Subpart F income from tiered extraordinary reduction amounts not eligible for subpart F exception under section 954(c)(6)	1d	
e	Section 954(c) Subpart F Foreign Personal Holding Company Income (enter result from Worksheet A) . .	1e	
f	Section 954(d) Subpart F Foreign Base Company Sales Income (enter result from Worksheet A)	1f	
g	Section 954(e) Subpart F Foreign Base Company Services Income (enter result from Worksheet A) . . .	1g	
h	Other subpart F income (enter result from Worksheet A)	1h	
2	Earnings invested in U.S. property (enter the result from Worksheet B)	2	
3	Reserved for future use	3	
4	Factoring income See instructions for reporting amounts on lines 1, 2, and 4 on your income tax return.	4	
5a	Section 245A eligible dividends (see instructions)	5a	
b	Extraordinary disposition amounts (see instructions)	5b	
c	Extraordinary reduction amounts (see instructions)	5c	
d	Section 245A(e) dividends (see instructions)	5d	
e	Dividends not reported on line 5a, 5b, 5c, or 5d	5e	
6	Exchange gain or (loss) on a distribution of previously taxed earnings and profits	6	

	Yes	No
7a Was any income of the foreign corporation blocked?		
b Did any such income become unblocked during the tax year (see section 964(b))?		
If the answer to either question is "Yes," attach an explanation.		
8a Did this U.S. shareholder have an extraordinary disposition (ED) account with respect to the foreign corporation at any time during the tax year (see instructions)?		
b If the answer to question 8a is "Yes," enter the U.S. shareholder's ED account balance at the beginning of the CFC year \$ _____ and at the end of the tax year \$ _____. Provide an attachment detailing any changes from the beginning to the ending balances.		
c Enter the CFC's aggregate ED account balance with respect to all U.S. shareholders at the beginning of the CFC year \$ _____ and at the end of the tax year \$ _____. Provide an attachment detailing any changes from the beginning to the ending balances.		
9 Enter the sum of the hybrid deduction accounts with respect to stock of the foreign corporation (see instructions) \$ _____		

Form **5471** (Rev. 12-2022)

**SCHEDULE E
(Form 5471)**

(Rev. December 2021)

Department of the Treasury
Internal Revenue Service**Income, War Profits, and Excess Profits Taxes Paid or Accrued**

▶ Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471

Global Benefits Group Inc

Name of foreign corporation

GBG SERVICES (INDIA) PRIVATE LIMITED

Identifying number

20-3842750

Reference ID number (see instructions)

541990

a Separate Category (Enter code - see instructions.) ▶ GEN

b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions). ▶

c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶

Part I Taxes for Which a Foreign Tax Credit Is Allowed**Section 1 - Taxes Paid or Accrued Directly by Foreign Corporation**

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Unsuspended Taxes	(d) Country or U.S. Possession to Which Tax Is Paid (Enter code - see instructions. Use a separate line for each.)	(e) Foreign Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)	(f) U.S. Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)
1	GBG Services (India) Private Limited	541990		IN	2022/01/01	2022/12/31
2						
3						
4						

	(g) Income Subject to Tax in the Foreign Jurisdiction (see instructions)	(h) If taxes are paid on U.S. source income, check box	(i) Local Currency in Which Tax Is Payable (enter code - see instructions)	(j) Tax Paid or Accrued (in local currency in which the tax is payable)	(k) Conversion Rate to U.S. Dollars	(l) In U.S. Dollars (divide column (j) by column (k))	(m) In Functional Currency of Foreign Corporation
1	146,874.		INR	3,269,651.	78.5887600	41,605.	3,269,651.
2							
3							
4							
5	Total (combine lines 1 through 4 of column (l)). Also report amount on Schedule E-1, line 4 ▶					41,605.	
6	Total (combine lines 1 through 4 of column (m)) ▶						3,269,651.

Section 2 - Taxes Deemed Paid by Foreign Corporation

	(a) Name of Lower-Tier Distributing Foreign Corporation	(b) EIN or Reference ID Number of Lower-Tier Distributing Foreign Corporation	(c) Country or U.S. Possession to Which Tax Is Paid (Enter code - see instructions. Use a separate line for each.)	(d) PTEP Group (enter code)	(e) Annual PTEP Account (enter year)
1					
2					
3					
4					

	(f) PTEP Distributed (enter amount in functional currency)	(g) Total Amount of PTEP in the PTEP Group (in functional currency)	(h) Total Amount of the PTEP Group Taxes With Respect to PTEP Group (USD)	(i) Foreign Income Taxes Properly Attributable to PTEP and not Previously Deemed Paid ((column (f)/column (g)) x column (h)) (USD)
1				
2				
3				
4				
5	Total (combine lines 1 through 4 of column (i)). Also report amount on Schedule E-1, line 6 ▶			

For Paperwork Reduction Act Notice, see instructions.

Schedule E (Form 5471) (Rev. 12-2021)

JSA

2X1666 2.000

0001W4 X45R

Name of foreign corporation GBG SERVICES (INDIA) PRIVATE LIMITED	EIN (if any)	Reference ID number (see instructions) 541990
a Separate Category (Enter code-see instructions.)		▶ GEN
b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions)		▶
c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions)		▶

Part II Election

For tax years beginning after December 31, 2004, has an election been made under section 986(a)(1)(D) to translate taxes using the exchange rate on the date of payment?

☐ Yes ☒ No If "Yes," state date of election ▶

Part III Taxes for Which a Foreign Tax Credit Is Disallowed (Enter in functional currency of foreign corporation.)

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Section 901(j)	(d) Section 901(k) and (l)	(e) Section 901(m)	(f) U.S. Taxes	(g) Suspended Taxes	(h) Other	(i) Total
1									
2									
3	In functional currency (combine lines 1 and 2)								▶
4	In U.S. dollars (translated at the average exchange rate, as defined in section 989(b)(3) and related regulations (see instructions)).								▶

Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Earnings and Profits (E&P) of Foreign Corporation

IMPORTANT: Enter amounts in U.S. dollars.

		Taxes related to:			
		(a) Subpart F Income	(b) Tested Income	(c) Residual Income	(d) Suspended Taxes
1a	Balance at beginning of year (as reported in prior year Schedule E-1)	-0-	-0-	-0-	
b	Beginning balance adjustments (attach statement)				
c	Adjusted beginning balance (combine lines 1a and 1b)				
2	Adjustment for foreign tax redetermination.				
3a	Taxes unsuspended under anti-splitter rules				
b	Taxes suspended under anti-splitter rules.				
4	Taxes reported on Schedule E, Part I, Section 1, line 5, column (l)		41,605.		
5	Taxes carried over in nonrecognition transactions				
6	Taxes reported on Schedule E, Part I, Section 2, line 5, column (i).				
7	Other adjustments (attach statement).				
8	Taxes paid or accrued on current income/E&P or accumulated E&P (combine lines 1c through 7)		41,605.		
9	Taxes deemed paid with respect to inclusions (see instructions)				
10	Taxes deemed paid with respect to actual distributions				
11	Taxes on amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P				
12	Other (attach statement).				
13	Balance of taxes paid or accrued (combine lines 8 through 12 in columns (a), (b), and (c))		41,605.		
14	Reserved for future use				
15	Reduction for other taxes not deemed paid.				
16	Balance of taxes paid or accrued at the beginning of the next year. Line 16, columns (a), (b), and (c) must always equal zero. So, if necessary, enter negative amounts on line 15 of columns (a), (b), and (c) in amounts sufficient to reduce line 13, columns (a), (b), and (c) to zero. For the remaining columns, combine lines 8 through 12	-0-	-0-	-0-	

Schedule E (Form 5471) (Rev. 12-2021)

Page **3**

Name of foreign corporation	EIN (if any)	Reference ID number (see instructions)
GBG SERVICES (INDIA) PRIVATE LIMITED		541990

- a** Separate Category (Enter code - see instructions.) **GEN**
- b** If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions)
- c** If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions)

Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Accumulated Earnings and Profits (E&P) of Foreign Corporation (continued)

(e) Taxes related to previously taxed E&P (see instructions)

	(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP
1a										
b										
c										
2										
3a										
b										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										

Schedule E (Form 5471) (Rev. 12-2021)

Document Page 99 of 322
Current Earnings and Profits**SCHEDULE H**
(Form 5471)(Rev. December 2021)
Department of the Treasury
Internal Revenue Service

▶ Attach to Form 5471.

OMB No. 1545-0123

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

GBG SERVICES (INDIA) PRIVATE LIMITED

EIN (if any)

Reference ID number (see instructions)

541990

IMPORTANT: Enter the amounts on lines 1 through 5c in **functional** currency.

1	Current year net income or (loss) per foreign books of account.		1	8,273,027.
2	Net adjustments made to line 1 to determine current earnings and profits according to U.S. financial and tax accounting standards (see instructions):	Net Additions	Net Subtractions	
a	Capital gains or losses.	2a		
b	Depreciation and amortization.	2b		
c	Depletion.	2c		
d	Investment or incentive allowance.	2d		
e	Charges to statutory reserves.	2e		
f	Inventory adjustments.	2f		
g	Income taxes (see Schedule E, Part I, Section 1, line 6, column (m), and Part III, line 3, column (i)).	2g	3,269,651.	
h	Foreign currency gains or losses.	2h		
i	Other (attach statement).	2i		
3	Total net additions.	3	3,269,651.	
4	Total net subtractions.	4		
5a	Current earnings and profits (line 1 plus line 3 minus line 4).	5a		11,542,678.
b	DASTM gain or (loss) for foreign corporations that use DASTM (see instructions).	5b		
c	Combine lines 5a and 5b and enter the result on line 5c. Then enter on lines 5c(i), 5c(ii), and 5c(iii)(A) through 5c(iii)(D) the portion of the line 5c amount with respect to the categories of income shown on those lines.	5c		11,542,678.
	(i) General category (enter amount on applicable Schedule J, Part I, line 3, column (a)).	5c(i)		
	(ii) Passive category (enter amount on applicable Schedule J, Part I, line 3, column (a)).	5c(ii)		
	(iii) Section 901(j) category:			
	(A) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(A) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(A)		
	(B) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(B) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(B)		
	(C) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(C) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(C)		
	(D) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(D) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(D)		
d	Current earnings and profits in U.S. dollars (line 5c translated at the average exchange rate, as defined in section 989(b)(3) and the related regulations (see instructions)).	5d		139,492.
e	Enter exchange rate used for line 5d. ▶		82.7477390	

For Paperwork Reduction Act Notice, see instructions.

Schedule H (Form 5471) (Rev. 12-2021)

**SCHEDULE I-1
(Form 5471)**

(Rev. December 2021)

Department of the Treasury
Internal Revenue Service**Information for Global Intangible Low-Taxed Income**

► Attach to Form 5471.

► Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

GBG SERVICES (INDIA) PRIVATE LIMITED

EIN (if any)

Reference ID number (see instructions)

541990

Separate Category (Enter code - see instructions.)

► GEN

		Functional Currency	Conversion Rate	U.S. Dollars
1 Gross income (see instructions if cost of goods sold exceed gross receipts)	1	169,676,899.		
2 Exclusions (see instructions if cost of goods sold exceed gross receipts)				
a Effectively connected income	2a			
b Subpart F income	2b			
c High-tax exception income per section 954(b)(4)	2c			
d Related party dividends	2d			
e Foreign oil and gas extraction income	2e			
3 Total exclusions (combine lines 2a through 2e)	3			
4 Gross income less total exclusions (line 1 minus line 3) (see instructions)	4	169,676,899.		
5 Deductions properly allocable to amount on line 4	5	161,403,872.		
6 Tested income (loss) (line 4 minus line 5) (see instructions)	6	8,273,027.	78.5887600	105,270.
7 Tested foreign income taxes	7		78.5887600	
8 Qualified business asset investment (QBAI)	8		78.5887600	
9a Interest expense included on line 5	9a			
b Qualified interest expense	9b			
c Tested loss QBAI amount	9c			
d Tested interest expense (line 9a minus the sum of line 9b and line 9c). If zero or less, enter -0-	9d		78.5887600	
10a Interest income included in line 4	10a	119,926.		
b Qualified interest income	10b			
c Tested interest income (line 10a minus line 10b). If zero or less, enter -0-	10c	119,926.	78.5887600	1,526.

For Paperwork Reduction Act Notice, see instructions.

Schedule I-1 (Form 5471) (Rev. 12-2021)

**SCHEDULE J
(Form 5471)**(Rev. December 2020)
Department of the Treasury
Internal Revenue Service**Accumulated Earnings & Profits (E&P) of Controlled Foreign Corporation**► **Attach to Form 5471.**

OMB No. 1545-0123

► **Go to www.irs.gov/Form5471 for instructions and the latest information.**

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

GBG SERVICES (INDIA) PRIVATE LIMITED

EIN (if any)

Reference ID number (see instructions)

541990

a Separate Category (Enter code - see instructions.)

GEN

b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions)**Part I Accumulated E&P of Controlled Foreign Corporation**☐ Check the box if person filing return does not have all U.S. shareholders' information to complete an amount in column (e) (see instructions).**Important:** Enter amounts in functional currency.

		(a) Post-2017 E&P Not Previously Taxed (post-2017 section 959(c)(3) balance)	(b) Post-1986 Undistributed Earnings (post-1986 and pre-2018 section 959(c)(3) balance)	(c) Pre-1987 E&P Not Previously Taxed (pre-1987 section 959(c)(3) balance)	(d) Hovering Deficit and Deduction for Suspended Taxes	(e) Previously Taxed E&P (see instructions)	
						(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP
1a	Balance at beginning of year (as reported on prior year Schedule J)	41,193,103.					
b	Beginning balance adjustments (attach statement)						
c	Adjusted beginning balance (combine lines 1a and 1b)	41,193,103.					
2a	Reduction for taxes unsuspended under anti-splitter rules						
b	Disallowed deduction for taxes suspended under anti-splitter rules						
3	Current year E&P (or deficit in E&P) (enter amount from applicable line 5c of Schedule H)	11,542,678.					
4	E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation						
5a	E&P carried over in nonrecognition transaction						
b	Reclassify deficit in E&P as hovering deficit after nonrecognition transaction						
6	Other adjustments (attach statement)						
7	Total current and accumulated E&P (combine lines 1c through 6)	52,735,781.					
8	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P						
9	Actual distributions						
10	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P						
11	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)						
12	Other adjustments (attach statement)						
13	Hovering deficit offset of undistributed post-transaction E&P (see instructions)						
14	Balance at beginning of next year (combine lines 7 through 13)	52,735,781.					

For Paperwork Reduction Act Notice, see the Instructions for Form 5471.**Schedule J (Form 5471) (Rev. 12-2020)**

JSA

2X1665 2.000

0001W4 X45R

Part I Accumulated E&P of Controlled Foreign Corporation (continued)

	(e) Previously Taxed E&P (see instructions)				
	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP
1 a					
b					
c					
2 a					
b					
3					
4					
5 a					
b					
6					
7					
8					
9					
10					
11					
12					
13					
14					

	(e) Previously Taxed E&P (see instructions)			(f)
	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP	Total Section 964(a) E&P (combine columns (a), (b), (c), and (e)(i) through (e)(x))
1 a				41,193,103.
b				
c				41,193,103.
2 a				
b				
3				11,542,678.
4				
5 a				
b				
6				
7				52,735,781.
8				
9				
10				
11				
12				
13				
14				52,735,781.

Part II **Nonpreviously Taxed E&P Subject to Recapture as Subpart F Income (section 952(c)(2))**

Important: Enter amounts in functional currency.

1	Balance at beginning of year	▶	1	
2	Additions (amounts subject to future recapture).	▶	2	
3	Subtractions (amounts recaptured in current year)	▶	3	
4	Balance at end of year (combine lines 1 through 3)	▶	4	

Schedule J (Form 5471) (Rev. 12-2020)

SCHEDULE M
(Form 5471)(Rev. December 2021)
Department of the Treasury
Internal Revenue Service**Transactions Between Controlled Foreign Corporation
and Shareholders or Other Related Persons**

OMB No. 1545-0123

▶ Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471

Identifying number

Global Benefits Group Inc

20-3842750

Name of foreign corporation

EIN (if any)

Reference ID number (see instructions)

GBG SERVICES (INDIA) PRIVATE LIMITED

541990

Important: Complete a **separate** Schedule M for each controlled foreign corporation. Enter the totals for each type of transaction that occurred during the annual accounting period between the foreign corporation and the persons listed in columns (b) through (f). All amounts must be stated in U.S. dollars translated from functional currency at the average exchange rate for the foreign corporation's tax year. See instructions.

Enter the relevant functional currency and the exchange rate used throughout this schedule ▶

INR

(a) Transactions of foreign corporation	(b) U.S. person filing this return	(c) Any domestic corporation or partnership controlled by U.S. person filing this return	(d) Any other foreign corporation or partnership controlled by U.S. person filing this return	(e) 10% or more U.S. shareholder of controlled foreign corporation (other than the U.S. person filing this return)	(f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation
1 Sales of stock in trade (inventory)					
2 Sales of tangible property other than stock in trade					
3 Sales of property rights (patents, trademarks, etc.).					
4 Platform contribution transaction payments received					
5 Cost sharing transaction payments received					
6 Compensation received for technical, managerial, engineering, construction, or like services . .					
7 Commissions received	2,282,615.				
8 Rents, royalties, and license fees received					
9 Hybrid dividends received (see instructions)					
10 Dividends received (exclude hybrid dividends, deemed distributions under subpart F, and distributions of previously taxed income)					
11 Interest received.					
12 Premiums received for insurance or reinsurance.					
13 Loan guarantee fees received .					
14 Other amounts received (attach statement)					
15 Add lines 1 through 14	2,282,615.				
16 Purchases of stock in trade (inventory)					
17 Purchases of tangible property other than stock in trade. . . .					
18 Purchases of property rights (patents, trademarks, etc.) . . .					
19 Platform contribution transaction payments paid					
20 Cost sharing transaction payments paid .					
21 Compensation paid for technical, managerial, engineering, construction, or like services . .					
22 Commissions paid					
23 Rents, royalties, and license fees paid					
24 Hybrid dividends paid (see instructions)					
25 Dividends paid (exclude hybrid dividends paid)					
26 Interest paid					
27 Premiums paid for insurance or reinsurance					
28 Loan guarantee fees paid . . .					
29 Other amounts paid (attach statement). .					
30 Add lines 16 through 29. . . .					

For Paperwork Reduction Act Notice, see the Instructions for Form 5471.

Schedule M (Form 5471) (Rev. 12-2021)

Schedule M (Form 5471) (Rev. 12-2021)

Page 2

Name of person filing Form 5471

Identifying number

(a) Transactions of foreign corporation	(b) U.S. person filing this return	(c) Any domestic corporation or partnership controlled by U.S. person filing this return	(d) Any other foreign corporation or partnership controlled by U.S. person filing this return	(e) 10% or more U.S. shareholder of controlled foreign corporation (other than the U.S. person filing this return)	(f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation
31 Accounts Payable					
32 Amounts borrowed (enter the maximum loan balance during the year) - see instructions					
33 Accounts Receivable	1,399,862.				
34 Amounts loaned (enter the maximum loan balance during the year) - see instructions					

Schedule M (Form 5471) (Rev. 12-2021)

**SCHEDULE P
(Form 5471)**

(Rev. December 2020)

Department of the Treasury
Internal Revenue Service**Previously Taxed Earnings and Profits of U.S. Shareholder
of Certain Foreign Corporations**

▶ Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of U.S. shareholder

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

GBG SERVICES (INDIA) PRIVATE LIMITED

EIN (if any)

Reference ID number (see instructions)

541990

a Separate Category (Enter code - see instructions.)

▶ GEN

b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions)**Part I Previously Taxed E&P in Functional Currency** (see instructions)

		(a) Reclassified section 965(a) PTEP	(b) Reclassified section 965(b) PTEP	(c) General section 959(c)(1) PTEP
1a	Balance at beginning of year (see instructions)			
b	Beginning balance adjustments (attach statement)			
c	Adjusted beginning balance (combine lines 1a and 1b)			
2	Reduction for taxes unsuspended under anti-splitter rules			
3	Previously taxed E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation			
4	Previously taxed E&P carried over in nonrecognition transaction			
5	Other adjustments (attach statement)			
6	Total previously taxed E&P (combine lines 1c through 5)			
7	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P			
8	Actual distributions of previously taxed E&P			
9	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P			
10	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)			
11	Other adjustments (attach statement)			
12	Balance at beginning of next year (combine lines 6 through 11)			

For Paperwork Reduction Act Notice, see instructions.

Schedule P (Form 5471) (Rev. 12-2020)

Part I **Previously Taxed E&P in Functional Currency** (see instructions) *(continued)*

	(d) Reclassified section 951A PTEP	(e) Reclassified section 245A(d) PTEP	(f) Section 965(a) PTEP	(g) Section 965(b) PTEP	(h) Section 951A PTEP	(i) Section 245A(d) PTEP	(j) Section 951(a)(1)(A) PTEP	(k) Total
1a								
b								
c								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								

Part II Previously Taxed E&P in U.S. Dollars

		(a) Reclassified section 965(a) PTEP	(b) Reclassified section 965(b) PTEP	(c) General section 959(c)(1) PTEP
1 a	Balance at beginning of year (see instructions)			
b	Beginning balance adjustments (attach statement)			
c	Adjusted beginning balance (combine lines 1a and 1b)			
2	Reduction for taxes unsuspended under anti-splitter rules			
3	Previously taxed E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation			
4	Previously taxed E&P carried over in nonrecognition transaction			
5	Other adjustments (attach statement)			
6	Total previously taxed E&P (combine lines 1c through 5)			
7	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P			
8	Actual distributions of previously taxed E&P			
9	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P			
10	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)			
11	Other adjustments (attach statement)			
12	Balance at beginning of next year (combine lines 6 through 11)			

Schedule P (Form 5471) (Rev. 12-2020)

Part II Previously Taxed E&P in U.S. Dollars *(continued)*

	(d) Reclassified section 951A PTEP	(e) Reclassified section 245A(d) PTEP	(f) Section 965(a) PTEP	(g) Section 965(b) PTEP	(h) Section 951A PTEP	(i) Section 245A(d) PTEP	(j) Section 951(a)(1)(A) PTEP	(k) Total
1a								
b								
c								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								

Schedule P (Form 5471) (Rev. 12-2020)

SCHEDULE Q
(Form 5471)(Rev. December 2022)
Department of the Treasury
Internal Revenue Service**CFC Income by CFC Income Groups**

Attach to Form 5471.

OMB No. 1545-0123

Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

GBG SERVICES (INDIA) PRIVATE LIMITED

EIN (if any)

Reference ID number (see instructions)

541990

Complete a separate Schedule Q with respect to each applicable category of income (see instructions).

A Enter separate category code with respect to which this Schedule Q is being completed (see instructions for codes) GEN**B** If category code "PAS" is entered on line A, enter the applicable grouping code (see instructions)**C** If code "901j" is entered on line A, enter the country code for the sanctioned country (see instructions)

Complete a separate Schedule Q for U.S. source income and foreign source income (see instructions for an exception).

D Indicate whether this Schedule Q is being completed for: ☐ U.S. source income or ☒ Foreign source income

Complete a separate Schedule Q for FOGEI or FORI income.

E If this Schedule Q is being completed for FOGEI or FORI income, check this box ☐Enter amounts in functional currency
of the foreign corporation (unless
otherwise noted).

	(i) Country Code	(ii) Gross Income	(iii) Definitely Related Expenses	(iv) Related Person Interest Expense	(v) Other Interest Expense	(vi) Research & Experimental Expenses	(vii) Other Expenses (attach schedule)
1 Subpart F Income Groups							
a Dividends, Interest, Rents, Royalties, & Annuities (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
b Net Gain From Certain Property Transactions (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
c Net Gain From Commodities Transactions (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
d Net Foreign Currency Gain (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
e Income Equivalent to Interest (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
f Other							
(1) Unit name: _____							
(2) Unit name: _____							
g Foreign Base Company Sales Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							

Important: See **Computer-Generated Schedule Q** in instructions.

For Paperwork Reduction Act Notice, see instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

JSA

2X1650 3.000

0001W4 X45R

Schedule Q (Form 5471) (Rev. 12-2022)

Page **2**

	(viii) Current Year Tax on Reattributed Income From Disregarded Payments	(ix) Current Year Tax on All Other Disregarded Payments	(x) Other Current Year Taxes	(xi) Net Income (column (ii) less columns (iii) through (x))	(xii) Foreign Taxes for Which Credit Allowed (U.S. Dollars)	(xiii) Average Asset Value	(xiv) High Tax Election	(xv) Loss Allocation	(xvi) Net Income After Loss Allocation (column (xi) minus column (xv))
1									
a									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
b									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
c									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
d									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
e									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
f									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
g									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		

Important: See **Computer-Generated Schedule Q** in instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

Schedule Q (Form 5471) (Rev. 12-2022)

Page **3**

Enter amounts in functional currency of the foreign corporation (unless otherwise noted).

	(i) Country Code	(ii) Gross Income	(iii) Definitely Related Expenses	(iv) Related Person Interest Expense	(v) Other Interest Expense	(vi) Research & Experimental Expenses	(vii) Other Expenses (attach schedule)
1 Subpart F Income Groups							
h Foreign Base Company Services Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
i Full Inclusion Foreign Base Company Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
j Insurance Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
k International Boycott Income							
l Bribes, Kickbacks, and Other Payments							
m Section 901(j) income							
2 Recaptured Subpart F Income							
3 Tested Income Group (Total)		169,676,899.					161,403,872.
(1) Unit name: Tested Income	IN	169,676,899.					161,403,872.
(2) Unit name: _____							
4 Residual Income Group (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
5 Total		169,676,899.					161,403,872.

Important: See **Computer-Generated Schedule Q** in instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

Schedule Q (Form 5471) (Rev. 12-2022)

Page **4**

	(viii) Current Year Tax on Reattributed Income From Disregarded Payments	(ix) Current Year Tax on All Other Disregarded Payments	(x) Other Current Year Taxes	(xi) Net Income (column (ii) less columns (iii) through (x))	(xii) Foreign Taxes for Which Credit Allowed (U.S. Dollars)	(xiii) Average Asset Value	(xiv) High Tax Election	(xv) Loss Allocation	(xvi) Net Income After Loss Allocation (column (xi) minus column (xv))
1									
h									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
i									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
j									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
k									
l									
m									
2									
3				8,273,027.					8,273,027.
(1)				8,273,027.			<input type="checkbox"/>		8,273,027.
(2)							<input type="checkbox"/>		
4									
(1)									
(2)									
5				8,273,027.					8,273,027.

Important: See **Computer-Generated Schedule Q** in instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

**SCHEDULE R
(Form 5471)**

(December 2020)
Department of the Treasury
Internal Revenue Service

Distributions From a Foreign Corporation

► Attach to Form 5471.

OMB No. 1545-0123

► Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471		Identifying number
Global Benefits Group Inc		20-3842750
Name of foreign corporation	EIN (if any)	Reference ID number (see instructions)
GBG SERVICES (INDIA) PRIVATE LIMITED		541990

	(a) Description of distribution	(b) Date of distribution	(c) Amount of distribution in foreign corporation's functional currency	(d) Amount of E&P distribution in foreign corporation's functional currency
1	No Distributions	12/31/2022	NONE	NONE
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				

Form **5471**

(Rev. December 2022)

Department of the Treasury
Internal Revenue Service**Information Return of U.S. Persons With Respect
to Certain Foreign Corporations**Go to www.irs.gov/Form5471 for instructions and the latest information.Information furnished for the foreign corporation's annual accounting period (tax year required by
section 898) (see instructions) beginning 01/01/2022 , and ending 12/31/2022

OMB No. 1545-0123

Attachment
Sequence No. **121**

Name of person filing this return

Global Benefits Group Inc

Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address)

27051 Towne Centre Drive, #210

City or town, state, and ZIP code

FOOTHILL RANCH, CA 92610

Filer's tax year beginning 01/01/2022 , and ending 12/31/2022

D Check box if this is a final Form 5471 for the foreign corporation ☐**E** Check if any excepted specified foreign financial assets are reported on this form (see instructions). ☐**F** Check the box if this Form 5471 has been completed using "Alternative Information" under Rev. Proc. 2019-40 ☐**G** If the box on line F is checked, enter the corresponding code for "Alternative Information" (see instructions)**H** Person(s) on whose behalf this information return is filed:

(1) Name	(2) Address	(3) Identifying number	(4) Check applicable box(es)		
			Shareholder	Officer	Director
GLOBAL BENEFITS GROUP, INC.	27422 PORTOLA PARKWAY, FOOTHILL RANCH CA 92610	20-3842750	X		

Important: Fill in all applicable lines and schedules. All information **must** be in English. All amounts **must** be stated in U.S. dollars unless otherwise indicated.

1a Name and address of foreign corporation GLOBAL BENEFITS GROUP CANADA LTD. 1000 - 592 BURRARD STREET VANCOUVER, BC BC V7X 1S8 CA				b(1) Employer identification number, if any 98-1016850	
				b(2) Reference ID number (see instructions) 00005	
				c Country under whose laws incorporated CA	
d Date of incorporation 05/04/2010	e Principal place of business CA	f Principal business activity code number 524210	g Principal business activity INSURANCE BROKER	h Functional currency code CAD	

2 Provide the following information for the foreign corporation's accounting period stated above.

a Name, address, and identifying number of branch office or agent (if any) in the United States	b If a U.S. income tax return was filed, enter:	
	(i) Taxable income or (loss)	(ii) U.S. income tax paid (after all credits)
c Name and address of foreign corporation's statutory or resident agent in country of incorporation	d Name and address (including corporate department, if applicable) of person (or persons) with custody of the books and records of the foreign corporation, and the location of such books and records, if different	

Schedule A Stock of the Foreign Corporation

(a) Description of each class of stock	(b) Number of shares issued and outstanding	
	(i) Beginning of annual accounting period	(ii) End of annual accounting period
COMMON	100.	100.

For Paperwork Reduction Act Notice, see instructions.

Form **5471** (Rev. 12-2022)

Schedule B	Shareholders of Foreign Corporation
Part I	U.S. Shareholders of Foreign Corporation (see instructions)

(a) Name, address, and identifying number of shareholder	(b) Description of each class of stock held by shareholder. Note: This description should match the corresponding description entered in Schedule A, column (a).	(c) Number of shares held at beginning of annual accounting period	(d) Number of shares held at end of annual accounting period	(e) Pro rata share of subpart F income (enter as a percentage)
GLOBAL BENEFITS GROUP, INC 27422 PORTOLA PARKWAY STE 110 FOOTHILL RANCH, CA 92610 20-3842750	COMMON STOCK	100.	100.	100.000000000000

Part II	Direct Shareholders of Foreign Corporation (see instructions)
----------------	--

(a) Name, address, and identifying number of shareholder. Also, include country of incorporation or formation, if applicable.	(b) Description of each class of stock held by shareholder. Note: This description should match the corresponding description entered in Schedule A, column (a).	(c) Number of shares held at beginning of annual accounting period	(d) Number of shares held at end of annual accounting period
GLOBAL BENEFITS GROUP INC 27422 PORTOLA PARKWAY STE 110 FOOTHILL RANCH, CA 92610 20-3842750 US	COMMON STOCK	100.	100.

Schedule C Income Statement (see instructions)

Important: Report all information in functional currency in accordance with U.S. generally accepted accounting principles (GAAP). Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules). However, if the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for dollar approximate separate transactions method (DASTM) corporations.

			Functional Currency	U.S. Dollars
Income	1a	Gross receipts or sales	1a	
	b	Returns and allowances	1b	
	c	Subtract line 1b from line 1a	1c	
	2	Cost of goods sold	2	
	3	Gross profit (subtract line 2 from line 1c)	3	
	4	Dividends	4	
	5	Interest	5	
	6a	Gross rents	6a	
	b	Gross royalties and license fees	6b	
	7	Net gain or (loss) on sale of capital assets	7	
Deductions	8a	Foreign currency transaction gain or loss - unrealized	8a	
	b	Foreign currency transaction gain or loss - realized	8b	-8,765.
	9	Other income (attach statement)	9	
	10	Total income (add lines 3 through 9)	10	-8,765.
	11	Compensation not deducted elsewhere	11	8,182.
	12a	Rents	12a	783.
	b	Royalties and license fees	12b	
	13	Interest	13	
	14	Depreciation not deducted elsewhere	14	
	15	Depletion	15	
Net Income	16	Taxes (exclude income tax expense (benefit))	16	
	17	Other deductions (attach statement - exclude income tax expense (benefit)). See Statement 40	17	85,990.
	18	Total deductions (add lines 11 through 17)	18	94,955.
	19	Net income or (loss) before unusual or infrequently occurring items, and income tax expense (benefit) (subtract line 18 from line 10) . .	19	-103,720.
	20	Unusual or infrequently occurring items	20	
	21a	Income tax expense (benefit) - current	21a	
Other Comprehensive Income	b	Income tax expense (benefit) - deferred	21b	
	22	Current year net income or (loss) per books (combine lines 19 through 21b) .	22	-103,720.
	23a	Foreign currency translation adjustments	23a	
	b	Other	23b	
	c	Income tax expense (benefit) related to other comprehensive income	23c	
	24	Other comprehensive income (loss), net of tax (line 23a plus line 23b less line 23c).	24	

Form 5471 (Rev. 12-2022)

Schedule F Balance Sheet**Important:** Report all amounts in U.S. dollars prepared and translated in accordance with U.S. GAAP. See instructions for an exception for DASTM corporations.

Assets		(a) Beginning of annual accounting period	(b) End of annual accounting period
1 Cash	1	835,951.	120,166.
2a Trade notes and accounts receivable	2a		
b Less allowance for bad debts	2b () ()		
3 Derivatives	3		
4 Inventories	4		
5 Other current assets (attach statement).	5		
6 Loans to shareholders and other related persons	6		
7 Investment in subsidiaries (attach statement).	7		
8 Other investments (attach statement)	8		
9a Buildings and other depreciable assets	9a		
b Less accumulated depreciation.	9b () ()		
10a Depletable assets	10a		
b Less accumulated depletion	10b () ()		
11 Land (net of any amortization)	11		
12 Intangible assets:			
a Goodwill	12a		
b Organization costs.	12b		
c Patents, trademarks, and other intangible assets	12c		
d Less accumulated amortization for lines 12a, 12b, and 12c	12d () ()		
13 Other assets (attach statement) See Statement 41.	13	-257,660.	-235,210.
14 Total assets	14	578,291.	-115,044.
Liabilities and Shareholders' Equity			
15 Accounts payable	15	NONE	433.
16 Other current liabilities (attach statement) See Statement 41.	16	617,414.	2,608.
17 Derivatives	17		
18 Loans from shareholders and other related persons	18		
19 Other liabilities (attach statement)	19		
20 Capital stock:			
a Preferred stock	20a		
b Common stock	20b		
21 Paid-in or capital surplus (attach reconciliation)	21		
22 Retained earnings	22	-39,122.	-118,085.
23 Less cost of treasury stock	23 () ()		
24 Total liabilities and shareholders' equity	24	578,292.	-115,044.

Schedule G Other Information

	Yes	No
1 During the tax year, did the foreign corporation own at least a 10% interest, directly or indirectly, in any foreign partnership? If "Yes," see the instructions for required statement.		X
2 During the tax year, did the foreign corporation own an interest in any trust?		X
3 During the tax year, did the foreign corporation own any foreign entities that were disregarded as separate from their owner under Regulations sections 301.7701-2 and 301.7701-3 or did the foreign corporation own any foreign branches (see instructions)? If "Yes," you are generally required to attach Form 8858 for each entity or branch (see instructions).		X
4a During the tax year, did the filer pay or accrue any base erosion payment under section 59A(d) to the foreign corporation or did the filer have a base erosion tax benefit under section 59A(c)(2) with respect to a base erosion payment made or accrued to the foreign corporation (see instructions)? If "Yes," complete lines 4b and 4c.		X
b Enter the total amount of the base erosion payments. \$ _____		
c Enter the total amount of the base erosion tax benefit \$ _____		
5a During the tax year, did the foreign corporation pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? If "Yes," complete line 5b.		X
b Enter the total amount of the disallowed deductions (see instructions) \$ _____		

Schedule G Other Information (continued)

	Yes	No
6a Is the filer claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any transactions with the foreign corporation? If "Yes," complete lines 6b, 6c, and 6d. See instructions.		X
b Enter the amount of gross receipts derived from all sales of general property to the foreign corporation that the filer included in its computation of foreign-derived deduction eligible income (FDDEI) \$ _____		
c Enter the amount of gross income derived from a license of property to the foreign corporation that the filer included in its computation of FDDEI (see instructions) \$ _____		
d Enter the amount of gross income derived from services provided to the foreign corporation that the filer included in its computation of FDDEI (see instructions) \$ _____		
7 During the tax year, was the foreign corporation a participant in any cost sharing arrangement? If the answer to question 7 is "Yes," complete a separate Schedule G-1 for each cost sharing arrangement in which the foreign corporation was a participant during the tax year.		X
8 From April 25, 2014, to December 31, 2017, did the foreign corporation purchase stock or securities of a shareholder of the foreign corporation for use in a triangular reorganization (within the meaning of Regulations section 1.358-6(b)(2))?		X
9a Did the foreign corporation receive any intangible property in a prior year or the current tax year for which the U.S. transferor is required to report a section 367(d) annual income inclusion for the taxable year? If "Yes," go to line 9b.		X
b Enter in functional currency the amount of the earnings and profits reduction pursuant to section 367(d)(2)(B) for the tax year \$ _____		
10 During the tax year, was the foreign corporation an expatriated foreign subsidiary under Regulations section 1.7874-12(a)(9)? If "Yes," see instructions and attach statement.		X
11 During the tax year, did the foreign corporation participate in any reportable transaction as defined in Regulations section 1.6011-4? If "Yes," attach Form(s) 8886 if required by Regulations section 1.6011-4(c)(3)(i)(G).		X
12 During the tax year, did the foreign corporation pay or accrue any foreign tax that was disqualified for credit under section 901(m)?		X
13 During the tax year, did the foreign corporation pay or accrue foreign taxes to which section 909 applies, or treat foreign taxes that were previously suspended under section 909 as no longer suspended?		X
14 Did you answer "Yes" to any of the questions in the instructions for line 14? If "Yes," enter the corresponding code(s) from the instructions and attach statement _____		X
15 Does the foreign corporation have interest expense disallowed under section 163(j) (see instructions)? If "Yes," enter the amount \$ _____		X
16 Does the foreign corporation have previously disallowed interest expense under section 163(j) carried forward to the current tax year (see instructions)? If "Yes," enter the amount \$ _____		X
17a Did any extraordinary reduction with respect to a controlling section 245A shareholder occur during the tax year (see instructions)?		X
b If the answer to question 17a is "Yes," was an election made to close the tax year such that no amount is treated as an extraordinary reduction amount or tiered extraordinary reduction amount (see instructions)?		
18 Does the reporting corporation have any loan to or from the related party to which the safe-haven rate rules of Regulations section 1.482-2(a)(2)(iii)(B) are applicable, and for which the reporting corporation used a rate of interest within the safe-haven range of Regulations section 1.482-2(a)(2)(iii)(B)(1) (100% to 130% of the AFR for the relevant term)?		X
19a Did the reporting corporation make at least one distribution or acquisition (as defined by Regulations section 1.385-3) during the period including the tax year and the preceding 3 tax years, or, during the period beginning 36 months before the date of the respective distribution or acquisition and ending 36 months afterward, did the reporting corporation issue or refinance indebtedness owed to a related party?		X
b If the answer to question 19a is "Yes," provide the following. (1) The amount of such distribution(s) and acquisition(s) \$ _____ (2) The amount of such related party indebtedness \$ _____		

Schedule I Summary of Shareholder's Income From Foreign Corporation (see instructions)

If item H on page 1 is completed, a separate Schedule I must be filed for each Category 4, 5a, or 5b filer for whom reporting is furnished on this Form 5471. This Schedule I is being completed for:

Name of U.S. shareholder Global Benefits Group, Inc.Identifying number 20-3842750

1a	Section 964(e)(4) subpart F dividend income from the sale of stock of a lower-tier foreign corporation (see instructions)	1a	
b	Section 245A(e)(2) subpart F income from hybrid dividends of tiered corporations (see instructions) . . .	1b	
c	Subpart F income from tiered extraordinary disposition amounts not eligible for subpart F exception under section 954(c)(6)	1c	
d	Subpart F income from tiered extraordinary reduction amounts not eligible for subpart F exception under section 954(c)(6)	1d	
e	Section 954(c) Subpart F Foreign Personal Holding Company Income (enter result from Worksheet A) . .	1e	
f	Section 954(d) Subpart F Foreign Base Company Sales Income (enter result from Worksheet A)	1f	
g	Section 954(e) Subpart F Foreign Base Company Services Income (enter result from Worksheet A) . . .	1g	
h	Other subpart F income (enter result from Worksheet A)	1h	
2	Earnings invested in U.S. property (enter the result from Worksheet B)	2	
3	Reserved for future use	3	
4	Factoring income See instructions for reporting amounts on lines 1, 2, and 4 on your income tax return.	4	
5a	Section 245A eligible dividends (see instructions)	5a	
b	Extraordinary disposition amounts (see instructions)	5b	
c	Extraordinary reduction amounts (see instructions)	5c	
d	Section 245A(e) dividends (see instructions)	5d	
e	Dividends not reported on line 5a, 5b, 5c, or 5d	5e	
6	Exchange gain or (loss) on a distribution of previously taxed earnings and profits	6	

	Yes	No
7a Was any income of the foreign corporation blocked?		X
b Did any such income become unblocked during the tax year (see section 964(b))?		
If the answer to either question is "Yes," attach an explanation.		
8a Did this U.S. shareholder have an extraordinary disposition (ED) account with respect to the foreign corporation at any time during the tax year (see instructions)?		X
b If the answer to question 8a is "Yes," enter the U.S. shareholder's ED account balance at the beginning of the CFC year \$ _____ and at the end of the tax year \$ _____. Provide an attachment detailing any changes from the beginning to the ending balances.		
c Enter the CFC's aggregate ED account balance with respect to all U.S. shareholders at the beginning of the CFC year \$ _____ and at the end of the tax year \$ _____. Provide an attachment detailing any changes from the beginning to the ending balances.		
9 Enter the sum of the hybrid deduction accounts with respect to stock of the foreign corporation (see instructions) \$ _____		

Form **5471** (Rev. 12-2022)

**SCHEDULE E
(Form 5471)**

(Rev. December 2021)

Department of the Treasury
Internal Revenue Service**Income, War Profits, and Excess Profits Taxes Paid or Accrued**

▶ Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471

Global Benefits Group Inc

Name of foreign corporation

GLOBAL BENEFITS GROUP CANADA LTD.

Identifying number

20-3842750

Reference ID number (see instructions)

00005

a Separate Category (Enter code - see instructions.) ▶ GEN

b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions). ▶

c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶

Part I Taxes for Which a Foreign Tax Credit Is Allowed**Section 1 - Taxes Paid or Accrued Directly by Foreign Corporation**

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Unsuspended Taxes	(d) Country or U.S. Possession to Which Tax Is Paid (Enter code - see instructions. Use a separate line for each.)	(e) Foreign Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)	(f) U.S. Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)
1	GLOBAL BENEFITS GROUP CANADA LTD	00005		CA	2022/01/01	2022/12/31
2						
3						
4						

	(g) Income Subject to Tax in the Foreign Jurisdiction (see instructions)	(h) If taxes are paid on U.S. source income, check box	(i) Local Currency in Which Tax Is Payable (enter code - see instructions)	(j) Tax Paid or Accrued (in local currency in which the tax is payable)	(k) Conversion Rate to U.S. Dollars	(l) In U.S. Dollars (divide column (j) by column (k))	(m) In Functional Currency of Foreign Corporation
1	NONE		CAD	NONE	1.3135400	NONE	
2							
3							
4							
5	Total (combine lines 1 through 4 of column (l)). Also report amount on Schedule E-1, line 4 ▶					NONE	
6	Total (combine lines 1 through 4 of column (m)) ▶						

Section 2 - Taxes Deemed Paid by Foreign Corporation

	(a) Name of Lower-Tier Distributing Foreign Corporation	(b) EIN or Reference ID Number of Lower-Tier Distributing Foreign Corporation	(c) Country or U.S. Possession to Which Tax Is Paid (Enter code - see instructions. Use a separate line for each.)	(d) PTEP Group (enter code)	(e) Annual PTEP Account (enter year)
1					
2					
3					
4					

	(f) PTEP Distributed (enter amount in functional currency)	(g) Total Amount of PTEP in the PTEP Group (in functional currency)	(h) Total Amount of the PTEP Group Taxes With Respect to PTEP Group (USD)	(i) Foreign Income Taxes Properly Attributable to PTEP and not Previously Deemed Paid ((column (f)/column (g)) x column (h)) (USD)
1				
2				
3				
4				
5	Total (combine lines 1 through 4 of column (i)). Also report amount on Schedule E-1, line 6 ▶			

For Paperwork Reduction Act Notice, see instructions.

Schedule E (Form 5471) (Rev. 12-2021)

JSA

2X1666 2.000

0001W4 X45R

Name of foreign corporation GLOBAL BENEFITS GROUP CANADA LTD.	EIN (if any) 98-1016850	Reference ID number (see instructions) 00005
a Separate Category (Enter code-see instructions).		▶ GEN
b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions)		▶
c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions)		▶

Part II Election

For tax years beginning after December 31, 2004, has an election been made under section 986(a)(1)(D) to translate taxes using the exchange rate on the date of payment?

☐ Yes ☒ No If "Yes," state date of election ▶

Part III Taxes for Which a Foreign Tax Credit Is Disallowed (Enter in functional currency of foreign corporation.)

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Section 901(j)	(d) Section 901(k) and (l)	(e) Section 901(m)	(f) U.S. Taxes	(g) Suspended Taxes	(h) Other	(i) Total
1									
2									
3	In functional currency (combine lines 1 and 2)								▶
4	In U.S. dollars (translated at the average exchange rate, as defined in section 989(b)(3) and related regulations (see instructions)).								▶

Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Earnings and Profits (E&P) of Foreign Corporation

IMPORTANT: Enter amounts in U.S. dollars.

		Taxes related to:			
		(a) Subpart F Income	(b) Tested Income	(c) Residual Income	(d) Suspended Taxes
1a	Balance at beginning of year (as reported in prior year Schedule E-1)	-0-	-0-	-0-	
b	Beginning balance adjustments (attach statement).				
c	Adjusted beginning balance (combine lines 1a and 1b)				
2	Adjustment for foreign tax redetermination.				
3a	Taxes unsuspended under anti-splitter rules				
b	Taxes suspended under anti-splitter rules.				
4	Taxes reported on Schedule E, Part I, Section 1, line 5, column (l)				
5	Taxes carried over in nonrecognition transactions				
6	Taxes reported on Schedule E, Part I, Section 2, line 5, column (i).				
7	Other adjustments (attach statement).				
8	Taxes paid or accrued on current income/E&P or accumulated E&P (combine lines 1c through 7)				
9	Taxes deemed paid with respect to inclusions (see instructions)				
10	Taxes deemed paid with respect to actual distributions				
11	Taxes on amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P				
12	Other (attach statement).				
13	Balance of taxes paid or accrued (combine lines 8 through 12 in columns (a), (b), and (c))				
14	Reserved for future use				
15	Reduction for other taxes not deemed paid.				
16	Balance of taxes paid or accrued at the beginning of the next year. Line 16, columns (a), (b), and (c) must always equal zero. So, if necessary, enter negative amounts on line 15 of columns (a), (b), and (c) in amounts sufficient to reduce line 13, columns (a), (b), and (c) to zero. For the remaining columns, combine lines 8 through 12	-0-	-0-	-0-	

Schedule E (Form 5471) (Rev. 12-2021)

Page 3

Name of foreign corporation	EIN (if any)	Reference ID number (see instructions)
GLOBAL BENEFITS GROUP CANADA LTD.	98-1016850	00005

- a Separate Category (Enter code - see instructions.) ▶ GEN
- b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶
- c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶

Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Accumulated Earnings and Profits (E&P) of Foreign Corporation (continued)

(e) Taxes related to previously taxed E&P (see instructions)

	(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP
1a										
b										
c										
2										
3a										
b										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										

Schedule E (Form 5471) (Rev. 12-2021)

Document Page 124 of 322
Current Earnings and Profits**SCHEDULE H**
(Form 5471)(Rev. December 2021)
Department of the Treasury
Internal Revenue Service

▶ Attach to Form 5471.

OMB No. 1545-0123

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

GLOBAL BENEFITS GROUP CANADA LTD.

EIN (if any)

98-1016850

Reference ID number (see instructions)

00005

IMPORTANT: Enter the amounts on lines 1 through 5c in **functional** currency.

1	Current year net income or (loss) per foreign books of account.			1	-103,720.
2	Net adjustments made to line 1 to determine current earnings and profits according to U.S. financial and tax accounting standards (see instructions):	Net Additions	Net Subtractions		
a	Capital gains or losses.	2a			
b	Depreciation and amortization.	2b			
c	Depletion.	2c			
d	Investment or incentive allowance.	2d			
e	Charges to statutory reserves.	2e			
f	Inventory adjustments.	2f			
g	Income taxes (see Schedule E, Part I, Section 1, line 6, column (m), and Part III, line 3, column (i)).	2g			
h	Foreign currency gains or losses.	2h			
i	Other (attach statement).	2i			
3	Total net additions.	3			
4	Total net subtractions.	4			
5a	Current earnings and profits (line 1 plus line 3 minus line 4).			5a	-103,720.
b	DASTM gain or (loss) for foreign corporations that use DASTM (see instructions).			5b	
c	Combine lines 5a and 5b and enter the result on line 5c. Then enter on lines 5c(i), 5c(ii), and 5c(iii)(A) through 5c(iii)(D) the portion of the line 5c amount with respect to the categories of income shown on those lines.			5c	-103,720.
	(i) General category (enter amount on applicable Schedule J, Part I, line 3, column (a)).	5c(i)			
	(ii) Passive category (enter amount on applicable Schedule J, Part I, line 3, column (a)).	5c(ii)			
	(iii) Section 901(j) category:				
	(A) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(A) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(A)			
	(B) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(B) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(B)			
	(C) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(C) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(C)			
	(D) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(D) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(D)			
d	Current earnings and profits in U.S. dollars (line 5c translated at the average exchange rate, as defined in section 989(b)(3) and the related regulations (see instructions)).			5d	-76,684.
e	Enter exchange rate used for line 5d. ▶		1.3525560		

For Paperwork Reduction Act Notice, see instructions.

Schedule H (Form 5471) (Rev. 12-2021)

**SCHEDULE I-1
(Form 5471)**

(Rev. December 2021)

Department of the Treasury
Internal Revenue Service**Information for Global Intangible Low-Taxed Income**

► Attach to Form 5471.

► Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

GLOBAL BENEFITS GROUP CANADA LTD.

EIN (if any)

98-1016850

Reference ID number (see instructions)

00005

Separate Category (Enter code - see instructions.)

► GEN

		Functional Currency	Conversion Rate	U.S. Dollars
1 Gross income (see instructions if cost of goods sold exceed gross receipts)	1	-8,765.		
2 Exclusions (see instructions if cost of goods sold exceed gross receipts)				
a Effectively connected income	2a			
b Subpart F income	2b			
c High-tax exception income per section 954(b)(4)	2c			
d Related party dividends	2d			
e Foreign oil and gas extraction income	2e			
3 Total exclusions (combine lines 2a through 2e)	3			
4 Gross income less total exclusions (line 1 minus line 3) (see instructions)	4	-8,765.		
5 Deductions properly allocable to amount on line 4	5	94,955.		
6 Tested income (loss) (line 4 minus line 5) (see instructions)	6	-103,720.	1.3135400	-78,962.
7 Tested foreign income taxes	7		1.3135400	
8 Qualified business asset investment (QBAI)	8		1.3135400	
9a Interest expense included on line 5	9a			
b Qualified interest expense	9b			
c Tested loss QBAI amount	9c			
d Tested interest expense (line 9a minus the sum of line 9b and line 9c). If zero or less, enter -0-	9d		1.3135400	
10a Interest income included in line 4	10a			
b Qualified interest income	10b			
c Tested interest income (line 10a minus line 10b). If zero or less, enter -0-	10c		1.3135400	

For Paperwork Reduction Act Notice, see instructions.

Schedule I-1 (Form 5471) (Rev. 12-2021)

**SCHEDULE J
(Form 5471)**(Rev. December 2020)
Department of the Treasury
Internal Revenue Service**Accumulated Earnings & Profits (E&P) of Controlled Foreign Corporation**► **Attach to Form 5471.**

OMB No. 1545-0123

► **Go to www.irs.gov/Form5471 for instructions and the latest information.**

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

GLOBAL BENEFITS GROUP CANADA LTD.

EIN (if any)

98-1016850

Reference ID number (see instructions)

00005

a Separate Category (Enter code - see instructions.) ► GEN**b** If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ►**Part I Accumulated E&P of Controlled Foreign Corporation**☐ Check the box if person filing return does not have all U.S. shareholders' information to complete an amount in column (e) (see instructions).**Important:** Enter amounts in functional currency.

		(a) Post-2017 E&P Not Previously Taxed (post-2017 section 959(c)(3) balance)	(b) Post-1986 Undistributed Earnings (post-1986 and pre-2018 section 959(c)(3) balance)	(c) Pre-1987 E&P Not Previously Taxed (pre-1987 section 959(c)(3) balance)	(d) Hovering Deficit and Deduction for Suspended Taxes	(e) Previously Taxed E&P (see instructions)	
						(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP
1a	Balance at beginning of year (as reported on prior year Schedule J)	-50,524.					
b	Beginning balance adjustments (attach statement)						
c	Adjusted beginning balance (combine lines 1a and 1b)	-50,524.					
2a	Reduction for taxes unsuspended under anti-splitter rules						
b	Disallowed deduction for taxes suspended under anti-splitter rules						
3	Current year E&P (or deficit in E&P) (enter amount from applicable line 5c of Schedule H)	-103,720.					
4	E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation						
5a	E&P carried over in nonrecognition transaction						
b	Reclassify deficit in E&P as hovering deficit after nonrecognition transaction						
6	Other adjustments (attach statement)						
7	Total current and accumulated E&P (combine lines 1c through 6)	-154,244.					
8	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P						
9	Actual distributions						
10	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P						
11	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)						
12	Other adjustments (attach statement)						
13	Hovering deficit offset of undistributed post- transaction E&P (see instructions)						
14	Balance at beginning of next year (combine lines 7 through 13)	-154,244.					

For Paperwork Reduction Act Notice, see the Instructions for Form 5471.**Schedule J (Form 5471) (Rev. 12-2020)**

JSA

2X1665 2.000

0001W4 X45R

Part I Accumulated E&P of Controlled Foreign Corporation (continued)

(e) Previously Taxed E&P (see instructions)					
	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP
1 a					
b					
c					
2 a					
b					
3					
4					
5 a					
b					
6					
7					
8					
9					
10					
11					
12					
13					
14					

(e) Previously Taxed E&P (see instructions)				(f)
	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP	Total Section 964(a) E&P (combine columns (a), (b), (c), and (e)(i) through (e)(x))
1 a				-50,524.
b				
c				-50,524.
2 a				
b				
3				-103,720.
4				
5 a				
b				
6				
7				-154,244.
8				
9				
10				
11				
12				
13				
14				-154,244.

Part II **Nonpreviously Taxed E&P Subject to Recapture as Subpart F Income (section 952(c)(2))**

Important: Enter amounts in functional currency.

1	Balance at beginning of year	▶	1	
2	Additions (amounts subject to future recapture).	▶	2	
3	Subtractions (amounts recaptured in current year)	▶	3	
4	Balance at end of year (combine lines 1 through 3)	▶	4	

Schedule J (Form 5471) (Rev. 12-2020)

SCHEDULE M
(Form 5471)(Rev. December 2021)
Department of the Treasury
Internal Revenue Service**Transactions Between Controlled Foreign Corporation
and Shareholders or Other Related Persons**

OMB No. 1545-0123

▶ Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471

Identifying number

Global Benefits Group Inc

20-3842750

Name of foreign corporation

EIN (if any)

Reference ID number (see instructions)

GLOBAL BENEFITS GROUP CANADA LTD.

98-1016850

00005

Important: Complete a **separate** Schedule M for each controlled foreign corporation. Enter the totals for each type of transaction that occurred during the annual accounting period between the foreign corporation and the persons listed in columns (b) through (f). All amounts must be stated in U.S. dollars translated from functional currency at the average exchange rate for the foreign corporation's tax year. See instructions.

Enter the relevant functional currency and the exchange rate used throughout this schedule ▶

CANADA, DOLLAR

(a) Transactions of foreign corporation	(b) U.S. person filing this return	(c) Any domestic corporation or partnership controlled by U.S. person filing this return	(d) Any other foreign corporation or partnership controlled by U.S. person filing this return	(e) 10% or more U.S. shareholder of controlled foreign corporation (other than the U.S. person filing this return)	(f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation
1 Sales of stock in trade (inventory)					
2 Sales of tangible property other than stock in trade					
3 Sales of property rights (patents, trademarks, etc.).					
4 Platform contribution transaction payments received					
5 Cost sharing transaction payments received					
6 Compensation received for technical, managerial, engineering, construction, or like services . .					
7 Commissions received					
8 Rents, royalties, and license fees received					
9 Hybrid dividends received (see instructions)					
10 Dividends received (exclude hybrid dividends, deemed distributions under subpart F, and distributions of previously taxed income)					
11 Interest received.					
12 Premiums received for insurance or reinsurance.					
13 Loan guarantee fees received .					
14 Other amounts received (attach statement)					
15 Add lines 1 through 14					
16 Purchases of stock in trade (inventory)					
17 Purchases of tangible property other than stock in trade. . . .					
18 Purchases of property rights (patents, trademarks, etc.) . . .					
19 Platform contribution transaction payments paid					
20 Cost sharing transaction payments paid .					
21 Compensation paid for technical, managerial, engineering, construction, or like services . .					
22 Commissions paid					
23 Rents, royalties, and license fees paid					
24 Hybrid dividends paid (see instructions)					
25 Dividends paid (exclude hybrid dividends paid)					
26 Interest paid					
27 Premiums paid for insurance or reinsurance					
28 Loan guarantee fees paid . . .					
29 Other amounts paid (attach statement). .					
30 Add lines 16 through 29. . . .					

For Paperwork Reduction Act Notice, see the Instructions for Form 5471.

Schedule M (Form 5471) (Rev. 12-2021)

Schedule M (Form 5471) (Rev. 12-2021)

Page 2

Name of person filing Form 5471

Identifying number

(a) Transactions of foreign corporation	(b) U.S. person filing this return	(c) Any domestic corporation or partnership controlled by U.S. person filing this return	(d) Any other foreign corporation or partnership controlled by U.S. person filing this return	(e) 10% or more U.S. shareholder of controlled foreign corporation (other than the U.S. person filing this return)	(f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation
31 Accounts Payable	146,856.				
32 Amounts borrowed (enter the maximum loan balance during the year) - see instructions					
33 Accounts Receivable	9,775.				
34 Amounts loaned (enter the maximum loan balance during the year) - see instructions					

Schedule M (Form 5471) (Rev. 12-2021)

**SCHEDULE P
(Form 5471)**

(Rev. December 2020)

Department of the Treasury
Internal Revenue Service**Previously Taxed Earnings and Profits of U.S. Shareholder
of Certain Foreign Corporations**

▶ Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471

Global Benefits Group Inc

Name of U.S. shareholder

Global Benefits Group Inc

Name of foreign corporation

GLOBAL BENEFITS GROUP CANADA LTD.

EIN (if any)

98-1016850

Identifying number

20-3842750

Identifying number

20-3842750

Reference ID number (see instructions)

00005

a Separate Category (Enter code - see instructions.)

GEN

b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions)**Part I Previously Taxed E&P in Functional Currency** (see instructions)

		(a) Reclassified section 965(a) PTEP	(b) Reclassified section 965(b) PTEP	(c) General section 959(c)(1) PTEP
1a	Balance at beginning of year (see instructions)			
b	Beginning balance adjustments (attach statement)			
c	Adjusted beginning balance (combine lines 1a and 1b)			
2	Reduction for taxes unsuspended under anti-splitter rules			
3	Previously taxed E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation			
4	Previously taxed E&P carried over in nonrecognition transaction			
5	Other adjustments (attach statement)			
6	Total previously taxed E&P (combine lines 1c through 5)			
7	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P			
8	Actual distributions of previously taxed E&P			
9	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P			
10	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)			
11	Other adjustments (attach statement)			
12	Balance at beginning of next year (combine lines 6 through 11)			

For Paperwork Reduction Act Notice, see instructions.

Schedule P (Form 5471) (Rev. 12-2020)

Part I **Previously Taxed E&P in Functional Currency** (see instructions) *(continued)*

	(d) Reclassified section 951A PTEP	(e) Reclassified section 245A(d) PTEP	(f) Section 965(a) PTEP	(g) Section 965(b) PTEP	(h) Section 951A PTEP	(i) Section 245A(d) PTEP	(j) Section 951(a)(1)(A) PTEP	(k) Total
1a								
b								
c								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								

Part II Previously Taxed E&P in U.S. Dollars

		(a) Reclassified section 965(a) PTEP	(b) Reclassified section 965(b) PTEP	(c) General section 959(c)(1) PTEP
1 a	Balance at beginning of year (see instructions)			
b	Beginning balance adjustments (attach statement)			
c	Adjusted beginning balance (combine lines 1a and 1b)			
2	Reduction for taxes unsuspended under anti-splitter rules			
3	Previously taxed E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation			
4	Previously taxed E&P carried over in nonrecognition transaction			
5	Other adjustments (attach statement)			
6	Total previously taxed E&P (combine lines 1c through 5)			
7	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P			
8	Actual distributions of previously taxed E&P			
9	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P			
10	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)			
11	Other adjustments (attach statement)			
12	Balance at beginning of next year (combine lines 6 through 11)			

Schedule P (Form 5471) (Rev. 12-2020)

Part II Previously Taxed E&P in U.S. Dollars *(continued)*

	(d) Reclassified section 951A PTEP	(e) Reclassified section 245A(d) PTEP	(f) Section 965(a) PTEP	(g) Section 965(b) PTEP	(h) Section 951A PTEP	(i) Section 245A(d) PTEP	(j) Section 951(a)(1)(A) PTEP	(k) Total
1a								
b								
c								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								

Schedule P (Form 5471) (Rev. 12-2020)

SCHEDULE Q
(Form 5471)(Rev. December 2022)
Department of the Treasury
Internal Revenue Service**CFC Income by CFC Income Groups**

Attach to Form 5471.

OMB No. 1545-0123

Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

GLOBAL BENEFITS GROUP CANADA LTD.

EIN (if any)

98-1016850

Reference ID number (see instructions)

00005

Complete a separate Schedule Q with respect to each applicable category of income (see instructions).

A Enter separate category code with respect to which this Schedule Q is being completed (see instructions for codes) GEN**B** If category code "PAS" is entered on line A, enter the applicable grouping code (see instructions)**C** If code "901j" is entered on line A, enter the country code for the sanctioned country (see instructions)

Complete a separate Schedule Q for U.S. source income and foreign source income (see instructions for an exception).

D Indicate whether this Schedule Q is being completed for: ☐ U.S. source income or ☒ Foreign source income

Complete a separate Schedule Q for FOGEI or FORI income.

E If this Schedule Q is being completed for FOGEI or FORI income, check this box ☐Enter amounts in functional currency
of the foreign corporation (unless
otherwise noted).

	(i) Country Code	(ii) Gross Income	(iii) Definitely Related Expenses	(iv) Related Person Interest Expense	(v) Other Interest Expense	(vi) Research & Experimental Expenses	(vii) Other Expenses (attach schedule)
1 Subpart F Income Groups							
a Dividends, Interest, Rents, Royalties, & Annuities (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
b Net Gain From Certain Property Transactions (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
c Net Gain From Commodities Transactions (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
d Net Foreign Currency Gain (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
e Income Equivalent to Interest (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
f Other							
(1) Unit name: _____							
(2) Unit name: _____							
g Foreign Base Company Sales Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							

Important: See **Computer-Generated Schedule Q** in instructions.

For Paperwork Reduction Act Notice, see instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

JSA

2X1650 3.000

0001W4 X45R

Schedule Q (Form 5471) (Rev. 12-2022)

Page **2**

	(viii) Current Year Tax on Reattributed Income From Disregarded Payments	(ix) Current Year Tax on All Other Disregarded Payments	(x) Other Current Year Taxes	(xi) Net Income (column (ii) less columns (iii) through (x))	(xii) Foreign Taxes for Which Credit Allowed (U.S. Dollars)	(xiii) Average Asset Value	(xiv) High Tax Election	(xv) Loss Allocation	(xvi) Net Income After Loss Allocation (column (xi) minus column (xv))
1									
a									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
b									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
c									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
d									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
e									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
f									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
g									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		

Important: See **Computer-Generated Schedule Q** in instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

Schedule Q (Form 5471) (Rev. 12-2022)

Page **3**

Enter amounts in functional currency of the foreign corporation (unless otherwise noted).

	(i) Country Code	(ii) Gross Income	(iii) Definitely Related Expenses	(iv) Related Person Interest Expense	(v) Other Interest Expense	(vi) Research & Experimental Expenses	(vii) Other Expenses (attach schedule)
1 Subpart F Income Groups							
h Foreign Base Company Services Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
i Full Inclusion Foreign Base Company Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
j Insurance Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
k International Boycott Income							
l Bribes, Kickbacks, and Other Payments							
m Section 901(j) income							
2 Recaptured Subpart F Income							
3 Tested Income Group (Total)		-8,765.					94,955.
(1) Unit name: Tested Income	CA	-8,765.					94,955.
(2) Unit name: _____							
4 Residual Income Group (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
5 Total		-8,765.					94,955.

Important: See **Computer-Generated Schedule Q** in instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

Schedule Q (Form 5471) (Rev. 12-2022)

Page **4**

	(viii) Current Year Tax on Reattributed Income From Disregarded Payments	(ix) Current Year Tax on All Other Disregarded Payments	(x) Other Current Year Taxes	(xi) Net Income (column (ii) less columns (iii) through (x))	(xii) Foreign Taxes for Which Credit Allowed (U.S. Dollars)	(xiii) Average Asset Value	(xiv) High Tax Election	(xv) Loss Allocation	(xvi) Net Income After Loss Allocation (column (xi) minus column (xv))
1									
h									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
i									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
j									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
k									
l									
m									
2									
3				-103,720.					-103,720.
(1)				-103,720.			<input type="checkbox"/>		-103,720.
(2)							<input type="checkbox"/>		
4									
(1)									
(2)									
5				-103,720.					-103,720.

Important: See **Computer-Generated Schedule Q** in instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

**SCHEDULE R
(Form 5471)**

(December 2020)
Department of the Treasury
Internal Revenue Service

Distributions From a Foreign Corporation

► Attach to Form 5471.

OMB No. 1545-0123

► Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471		Identifying number
Global Benefits Group Inc		20-3842750
Name of foreign corporation	EIN (if any)	Reference ID number (see instructions)
GLOBAL BENEFITS GROUP CANADA LTD.	98-1016850	00005

	(a) Description of distribution	(b) Date of distribution	(c) Amount of distribution in foreign corporation's functional currency	(d) Amount of E&P distribution in foreign corporation's functional currency
1	No Distributions	12/31/2022	NONE	NONE
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				

Form **5471**

(Rev. December 2022)

Department of the Treasury
Internal Revenue Service**Information Return of U.S. Persons With Respect
to Certain Foreign Corporations**Go to www.irs.gov/Form5471 for instructions and the latest information.Information furnished for the foreign corporation's annual accounting period (tax year required by
section 898) (see instructions) beginning 01/01/2022 , and ending 12/31/2022

OMB No. 1545-0123

Attachment
Sequence No. **121**

Name of person filing this return

Global Benefits Group Inc

Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address)

27422 PORTOLA PARKWAY - SUITE 110

City or town, state, and ZIP code

FOOTHILL RANCH, CA 92610

Filer's tax year beginning 01/01/2022 , and ending 12/31/2022

D Check box if this is a final Form 5471 for the foreign corporation ☐**E** Check if any excepted specified foreign financial assets are reported on this form (see instructions). ☐**F** Check the box if this Form 5471 has been completed using "Alternative Information" under Rev. Proc. 2019-40 ☐**G** If the box on line F is checked, enter the corresponding code for "Alternative Information" (see instructions)**H** Person(s) on whose behalf this information return is filed:

(1) Name	(2) Address	(3) Identifying number	(4) Check applicable box(es)		
			Shareholder	Officer	Director
GLOBAL BENEFITS GROUP, INC	27422 PORTOLA PARKWAY STE 110, FOOTHILL RANCH C	20-3842750	X		

Important: Fill in all applicable lines and schedules. All information **must** be in English. All amounts **must** be stated in U.S. dollars unless otherwise indicated.

1a Name and address of foreign corporation				b(1) Employer identification number, if any	
GLOBAL BENEFITS GROUP PROCESSING PHILIPPINES IN 88 CORPORATE CENTER, SUITE 1804 SEDENO STREET SALESCO VILLAGE, MAKATI CY RP					
				b(2) Reference ID number (see instructions)	
				881804	
				c Country under whose laws incorporated	
				RP	
d Date of incorporation	e Principal place of business	f Principal business activity code number	g Principal business activity	h Functional currency code	
03/12/2018	RP	524290	ASSISTANCE & OPERATIONS	PHP	

2 Provide the following information for the foreign corporation's accounting period stated above.

a Name, address, and identifying number of branch office or agent (if any) in the United States	b If a U.S. income tax return was filed, enter:	
	(i) Taxable income or (loss)	(ii) U.S. income tax paid (after all credits)
c Name and address of foreign corporation's statutory or resident agent in country of incorporation	d Name and address (including corporate department, if applicable) of person (or persons) with custody of the books and records of the foreign corporation, and the location of such books and records, if different	

Schedule A Stock of the Foreign Corporation

(a) Description of each class of stock	(b) Number of shares issued and outstanding	
	(i) Beginning of annual accounting period	(ii) End of annual accounting period
COMMON	125,000.	125,000.

For Paperwork Reduction Act Notice, see instructions.

Form **5471** (Rev. 12-2022)

(a) Name, address, and identifying number of shareholder	(b) Description of each class of stock held by shareholder. Note: This description should match the corresponding description entered in Schedule A, column (a).	(c) Number of shares held at beginning of annual accounting period	(d) Number of shares held at end of annual accounting period	(e) Pro rata share of subpart F income (enter as a percentage)
GLOBAL BENEFITS GROUP, INC 27422 PORTOLA PARKWAY STE 110 FOOTHILL RANCH, CA 92610 20-3842750	COMMON STOCK	125,000.	125,000.	100.000000000000

[illegible]

Schedule C Income Statement (see instructions)

Important: Report all information in functional currency in accordance with U.S. generally accepted accounting principles (GAAP). Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules). However, if the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for dollar approximate separate transactions method (DASTM) corporations.

			Functional Currency	U.S. Dollars
Income	1a Gross receipts or sales	1a		
	b Returns and allowances	1b		
	c Subtract line 1b from line 1a	1c		
	2 Cost of goods sold	2		
	3 Gross profit (subtract line 2 from line 1c)	3		
	4 Dividends	4		
	5 Interest	5	7,322.	137.
	6a Gross rents	6a		
	b Gross royalties and license fees	6b		
	7 Net gain or (loss) on sale of capital assets	7		
Deductions	8a Foreign currency transaction gain or loss - unrealized	8a		
	b Foreign currency transaction gain or loss - realized	8b	-498,655.	-9,339.
	9 Other income (attach statement) See Statement 42	9	28,411,747.	532,084.
	10 Total income (add lines 3 through 9)	10	27,920,414.	522,882.
	11 Compensation not deducted elsewhere	11	16,467,701.	308,401.
	12a Rents	12a	2,086,114.	39,068.
	b Royalties and license fees	12b		
	13 Interest	13		
	14 Depreciation not deducted elsewhere	14	802,591.	15,031.
	15 Depletion	15		
Net Income	16 Taxes (exclude income tax expense (benefit))	16		
	17 Other deductions (attach statement - exclude income tax expense (benefit)) See Statement 42	17	3,249,626.	60,857.
	18 Total deductions (add lines 11 through 17)	18	22,606,032.	423,357.
	19 Net income or (loss) before unusual or infrequently occurring items, and income tax expense (benefit) (subtract line 18 from line 10) . .	19	5,314,382.	99,526.
	20 Unusual or infrequently occurring items	20		
Other Comprehensive Income	21a Income tax expense (benefit) - current . . See Statement 42	21a	220,586.	4,131.
	b Income tax expense (benefit) - deferred	21b		
	22 Current year net income or (loss) per books (combine lines 19 through 21b) .	22	5,093,796.	95,395.
Other Comprehensive Income	23a Foreign currency translation adjustments	23a		
	b Other	23b		
	c Income tax expense (benefit) related to other comprehensive income	23c		
	24 Other comprehensive income (loss), net of tax (line 23a plus line 23b less line 23c)	24		

Form 5471 (Rev. 12-2022)

Schedule F Balance Sheet**Important:** Report all amounts in U.S. dollars prepared and translated in accordance with U.S. GAAP. See instructions for an exception for DASTM corporations.

Assets		(a) Beginning of annual accounting period	(b) End of annual accounting period
1 Cash	1	361,261.	387,764.
2a Trade notes and accounts receivable	2a	-154,711.	NONE
b Less allowance for bad debts	2b	() ()	
3 Derivatives	3		
4 Inventories	4		
5 Other current assets (attach statement). See Statement 43.	5	58,061.	65,092.
6 Loans to shareholders and other related persons	6		
7 Investment in subsidiaries (attach statement).	7		
8 Other investments (attach statement)	8		
9a Buildings and other depreciable assets	9a	172,170.	71,244.
b Less accumulated depreciation.	9b	(31,409.) (-23,479.)	
10a Depletable assets	10a		
b Less accumulated depletion	10b	() ()	
11 Land (net of any amortization)	11		
12 Intangible assets:			
a Goodwill	12a		
b Organization costs.	12b		
c Patents, trademarks, and other intangible assets	12c		
d Less accumulated amortization for lines 12a, 12b, and 12c	12d	() ()	
13 Other assets (attach statement) See Statement 43.	13	-23,461.	NONE
14 Total assets	14	381,911.	547,579.
Liabilities and Shareholders' Equity			
15 Accounts payable	15		
16 Other current liabilities (attach statement)	16		
17 Derivatives	17		
18 Loans from shareholders and other related persons	18		
19 Other liabilities (attach statement) See Statement 43.	19	-130,938.	-60,664.
20 Capital stock:			
a Preferred stock	20a		
b Common stock	20b	2,925.	2,925.
21 Paid-in or capital surplus (attach reconciliation). See Statement 43.	21	200,000.	200,000.
22 Retained earnings.	22	309,924.	405,318.
23 Less cost of treasury stock.	23	() ()	
24 Total liabilities and shareholders' equity	24	381,911.	547,579.

Schedule G Other Information

	Yes	No
1 During the tax year, did the foreign corporation own at least a 10% interest, directly or indirectly, in any foreign partnership? If "Yes," see the instructions for required statement.		X
2 During the tax year, did the foreign corporation own an interest in any trust?		X
3 During the tax year, did the foreign corporation own any foreign entities that were disregarded as separate from their owner under Regulations sections 301.7701-2 and 301.7701-3 or did the foreign corporation own any foreign branches (see instructions)? If "Yes," you are generally required to attach Form 8858 for each entity or branch (see instructions).		X
4a During the tax year, did the filer pay or accrue any base erosion payment under section 59A(d) to the foreign corporation or did the filer have a base erosion tax benefit under section 59A(c)(2) with respect to a base erosion payment made or accrued to the foreign corporation (see instructions)? If "Yes," complete lines 4b and 4c.		X
b Enter the total amount of the base erosion payments. \$ _____		
c Enter the total amount of the base erosion tax benefit \$ _____		
5a During the tax year, did the foreign corporation pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? If "Yes," complete line 5b.		X
b Enter the total amount of the disallowed deductions (see instructions) \$ _____		

Schedule G Other Information (continued)

	Yes	No
6a Is the filer claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any transactions with the foreign corporation? If "Yes," complete lines 6b, 6c, and 6d. See instructions.		X
b Enter the amount of gross receipts derived from all sales of general property to the foreign corporation that the filer included in its computation of foreign-derived deduction eligible income (FDDEI) \$ _____		
c Enter the amount of gross income derived from a license of property to the foreign corporation that the filer included in its computation of FDDEI (see instructions) \$ _____		
d Enter the amount of gross income derived from services provided to the foreign corporation that the filer included in its computation of FDDEI (see instructions) \$ _____		
7 During the tax year, was the foreign corporation a participant in any cost sharing arrangement? If the answer to question 7 is "Yes," complete a separate Schedule G-1 for each cost sharing arrangement in which the foreign corporation was a participant during the tax year.		X
8 From April 25, 2014, to December 31, 2017, did the foreign corporation purchase stock or securities of a shareholder of the foreign corporation for use in a triangular reorganization (within the meaning of Regulations section 1.358-6(b)(2))?		X
9a Did the foreign corporation receive any intangible property in a prior year or the current tax year for which the U.S. transferor is required to report a section 367(d) annual income inclusion for the taxable year? If "Yes," go to line 9b.		X
b Enter in functional currency the amount of the earnings and profits reduction pursuant to section 367(d)(2)(B) for the tax year \$ _____		
10 During the tax year, was the foreign corporation an expatriated foreign subsidiary under Regulations section 1.7874-12(a)(9)? If "Yes," see instructions and attach statement.		X
11 During the tax year, did the foreign corporation participate in any reportable transaction as defined in Regulations section 1.6011-4? If "Yes," attach Form(s) 8886 if required by Regulations section 1.6011-4(c)(3)(i)(G).		X
12 During the tax year, did the foreign corporation pay or accrue any foreign tax that was disqualified for credit under section 901(m)?		X
13 During the tax year, did the foreign corporation pay or accrue foreign taxes to which section 909 applies, or treat foreign taxes that were previously suspended under section 909 as no longer suspended?		X
14 Did you answer "Yes" to any of the questions in the instructions for line 14? If "Yes," enter the corresponding code(s) from the instructions and attach statement _____		X
15 Does the foreign corporation have interest expense disallowed under section 163(j) (see instructions)? If "Yes," enter the amount \$ _____		X
16 Does the foreign corporation have previously disallowed interest expense under section 163(j) carried forward to the current tax year (see instructions)? If "Yes," enter the amount \$ _____		X
17a Did any extraordinary reduction with respect to a controlling section 245A shareholder occur during the tax year (see instructions)?		X
b If the answer to question 17a is "Yes," was an election made to close the tax year such that no amount is treated as an extraordinary reduction amount or tiered extraordinary reduction amount (see instructions)?		
18 Does the reporting corporation have any loan to or from the related party to which the safe-haven rate rules of Regulations section 1.482-2(a)(2)(iii)(B) are applicable, and for which the reporting corporation used a rate of interest within the safe-haven range of Regulations section 1.482-2(a)(2)(iii)(B)(1) (100% to 130% of the AFR for the relevant term)?		X
19a Did the reporting corporation make at least one distribution or acquisition (as defined by Regulations section 1.385-3) during the period including the tax year and the preceding 3 tax years, or, during the period beginning 36 months before the date of the respective distribution or acquisition and ending 36 months afterward, did the reporting corporation issue or refinance indebtedness owed to a related party?		X
b If the answer to question 19a is "Yes," provide the following. (1) The amount of such distribution(s) and acquisition(s) \$ _____ (2) The amount of such related party indebtedness \$ _____		

Schedule I Summary of Shareholder's Income From Foreign Corporation (see instructions)

If item H on page 1 is completed, a separate Schedule I must be filed for each Category 4, 5a, or 5b filer for whom reporting is furnished on this Form 5471. This Schedule I is being completed for:

Name of U.S. shareholder Global Benefits Group Inc

Identifying number 20-3842750

1a	Section 964(e)(4) subpart F dividend income from the sale of stock of a lower-tier foreign corporation (see instructions)	1a	
b	Section 245A(e)(2) subpart F income from hybrid dividends of tiered corporations (see instructions) . . .	1b	
c	Subpart F income from tiered extraordinary disposition amounts not eligible for subpart F exception under section 954(c)(6)	1c	
d	Subpart F income from tiered extraordinary reduction amounts not eligible for subpart F exception under section 954(c)(6)	1d	
e	Section 954(c) Subpart F Foreign Personal Holding Company Income (enter result from Worksheet A) . .	1e	137.
f	Section 954(d) Subpart F Foreign Base Company Sales Income (enter result from Worksheet A)	1f	
g	Section 954(e) Subpart F Foreign Base Company Services Income (enter result from Worksheet A) . .	1g	
h	Other subpart F income (enter result from Worksheet A)	1h	
2	Earnings invested in U.S. property (enter the result from Worksheet B)	2	
3	Reserved for future use	3	
4	Factoring income See instructions for reporting amounts on lines 1, 2, and 4 on your income tax return.	4	
5a	Section 245A eligible dividends (see instructions)	5a	
b	Extraordinary disposition amounts (see instructions)	5b	
c	Extraordinary reduction amounts (see instructions)	5c	
d	Section 245A(e) dividends (see instructions)	5d	
e	Dividends not reported on line 5a, 5b, 5c, or 5d	5e	
6	Exchange gain or (loss) on a distribution of previously taxed earnings and profits	6	

	Yes	No
7a Was any income of the foreign corporation blocked?		
b Did any such income become unblocked during the tax year (see section 964(b))?		
If the answer to either question is "Yes," attach an explanation.		
8a Did this U.S. shareholder have an extraordinary disposition (ED) account with respect to the foreign corporation at any time during the tax year (see instructions)?		
b If the answer to question 8a is "Yes," enter the U.S. shareholder's ED account balance at the beginning of the CFC year \$ _____ and at the end of the tax year \$ _____. Provide an attachment detailing any changes from the beginning to the ending balances.		
c Enter the CFC's aggregate ED account balance with respect to all U.S. shareholders at the beginning of the CFC year \$ _____ and at the end of the tax year \$ _____. Provide an attachment detailing any changes from the beginning to the ending balances.		
9 Enter the sum of the hybrid deduction accounts with respect to stock of the foreign corporation (see instructions) \$ _____		

Form **5471** (Rev. 12-2022)

**SCHEDULE E
(Form 5471)**

(Rev. December 2021)

Department of the Treasury
Internal Revenue Service**Income, War Profits, and Excess Profits Taxes Paid or Accrued**

▶ Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471

Global Benefits Group Inc

Name of foreign corporation

GLOBAL BENEFITS GROUP PROCESSING PHILIPPINES

Identifying number

20-3842750

Reference ID number (see instructions)

881804

- a** Separate Category (Enter code - see instructions.) ▶ GEN
- b** If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions). ▶
- c** If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶

Part I Taxes for Which a Foreign Tax Credit Is Allowed**Section 1 - Taxes Paid or Accrued Directly by Foreign Corporation**

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Unsuspended Taxes	(d) Country or U.S. Possession to Which Tax Is Paid (Enter code - see instructions. Use a separate line for each.)	(e) Foreign Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)	(f) U.S. Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)
1	GBG Processing & Consulting (Philippines)	881804		RP	2022/01/01	2022/12/31
2						
3						
4						

	(g) Income Subject to Tax in the Foreign Jurisdiction (see instructions)	(h) If taxes are paid on U.S. source income, check box	(i) Local Currency in Which Tax Is Payable (enter code - see instructions)	(j) Tax Paid or Accrued (in local currency in which the tax is payable)	(k) Conversion Rate to U.S. Dollars	(l) In U.S. Dollars (divide column (j) by column (k))	(m) In Functional Currency of Foreign Corporation
1	511,029.		PHP	220,586.	53.3970700	4,131.	511,029.
2							
3							
4							
5	Total (combine lines 1 through 4 of column (l)). Also report amount on Schedule E-1, line 4 ▶					4,131.	
6	Total (combine lines 1 through 4 of column (m)) ▶						511,029.

Section 2 - Taxes Deemed Paid by Foreign Corporation

	(a) Name of Lower-Tier Distributing Foreign Corporation	(b) EIN or Reference ID Number of Lower-Tier Distributing Foreign Corporation	(c) Country or U.S. Possession to Which Tax Is Paid (Enter code - see instructions. Use a separate line for each.)	(d) PTEP Group (enter code)	(e) Annual PTEP Account (enter year)
1					
2					
3					
4					

	(f) PTEP Distributed (enter amount in functional currency)	(g) Total Amount of PTEP in the PTEP Group (in functional currency)	(h) Total Amount of the PTEP Group Taxes With Respect to PTEP Group (USD)	(i) Foreign Income Taxes Properly Attributable to PTEP and not Previously Deemed Paid ((column (f)/column (g)) x column (h)) (USD)
1				
2				
3				
4				
5	Total (combine lines 1 through 4 of column (i)). Also report amount on Schedule E-1, line 6 ▶			

For Paperwork Reduction Act Notice, see instructions.

Schedule E (Form 5471) (Rev. 12-2021)

JSA

2X1666 2.000

0001W4 X45R

Name of foreign corporation GLOBAL BENEFITS GROUP PROCESSING PHILIPPINES	EIN (if any)	Reference ID number (see instructions) 881804
a Separate Category (Enter code-see instructions).		▶ GEN
b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions)		▶
c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions)		▶

Part II Election

For tax years beginning after December 31, 2004, has an election been made under section 986(a)(1)(D) to translate taxes using the exchange rate on the date of payment?

☐ Yes ☒ No If "Yes," state date of election ▶
Part III Taxes for Which a Foreign Tax Credit Is Disallowed (Enter in functional currency of foreign corporation.)

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Section 901(j)	(d) Section 901(k) and (l)	(e) Section 901(m)	(f) U.S. Taxes	(g) Suspended Taxes	(h) Other	(i) Total
1									
2									
3	In functional currency (combine lines 1 and 2)								▶
4	In U.S. dollars (translated at the average exchange rate, as defined in section 989(b)(3) and related regulations (see instructions)).								▶

Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Earnings and Profits (E&P) of Foreign Corporation

IMPORTANT: Enter amounts in U.S. dollars.		Taxes related to:			
		(a) Subpart F Income	(b) Tested Income	(c) Residual Income	(d) Suspended Taxes
1a	Balance at beginning of year (as reported in prior year Schedule E-1)	-0-	-0-	-0-	
b	Beginning balance adjustments (attach statement)				
c	Adjusted beginning balance (combine lines 1a and 1b)				
2	Adjustment for foreign tax redetermination.				
3a	Taxes unsuspended under anti-splitter rules				
b	Taxes suspended under anti-splitter rules.				
4	Taxes reported on Schedule E, Part I, Section 1, line 5, column (l)		4,131.		
5	Taxes carried over in nonrecognition transactions				
6	Taxes reported on Schedule E, Part I, Section 2, line 5, column (i).				
7	Other adjustments (attach statement).				
8	Taxes paid or accrued on current income/E&P or accumulated E&P (combine lines 1c through 7)		4,131.		
9	Taxes deemed paid with respect to inclusions (see instructions)				
10	Taxes deemed paid with respect to actual distributions				
11	Taxes on amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P				
12	Other (attach statement).				
13	Balance of taxes paid or accrued (combine lines 8 through 12 in columns (a), (b), and (c))		4,131.		
14	Reserved for future use				
15	Reduction for other taxes not deemed paid.				
16	Balance of taxes paid or accrued at the beginning of the next year. Line 16, columns (a), (b), and (c) must always equal zero. So, if necessary, enter negative amounts on line 15 of columns (a), (b), and (c) in amounts sufficient to reduce line 13, columns (a), (b), and (c) to zero. For the remaining columns, combine lines 8 through 12	-0-	-0-	-0-	

Schedule E (Form 5471) (Rev. 12-2021)

Page **3**

Name of foreign corporation	EIN (if any)	Reference ID number (see instructions)
GLOBAL BENEFITS GROUP PROCESSING PHILIPPINES		881804

- a** Separate Category (Enter code - see instructions.) **GEN**
- b** If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions)
- c** If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions)

Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Accumulated Earnings and Profits (E&P) of Foreign Corporation (continued)

(e) Taxes related to previously taxed E&P (see instructions)

	(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP
1a										
b										
c										
2										
3a										
b										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										

Schedule E (Form 5471) (Rev. 12-2021)

Document Page 149 of 322
Current Earnings and ProfitsSCHEDULE H
(Form 5471)(Rev. December 2021)
Department of the Treasury
Internal Revenue Service

▶ Attach to Form 5471.

OMB No. 1545-0123

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471 Global Benefits Group Inc		Identifying number 20-3842750
Name of foreign corporation GLOBAL BENEFITS GROUP PROCESSING PHILIPPINES	EIN (if any)	Reference ID number (see instructions) 881804

IMPORTANT: Enter the amounts on lines 1 through 5c in **functional** currency.

1	Current year net income or (loss) per foreign books of account.			1	5,093,799.
2	Net adjustments made to line 1 to determine current earnings and profits according to U.S. financial and tax accounting standards (see instructions):	Net Additions	Net Subtractions		
a	Capital gains or losses.	2a			
b	Depreciation and amortization.	2b			
c	Depletion.	2c			
d	Investment or incentive allowance.	2d			
e	Charges to statutory reserves.	2e			
f	Inventory adjustments.	2f			
g	Income taxes (see Schedule E, Part I, Section 1, line 6, column (m), and Part III, line 3, column (i)).	2g	220,586.		
h	Foreign currency gains or losses.	2h			
i	Other (attach statement).	2i			
3	Total net additions.	3	220,586.		
4	Total net subtractions.	4			
5a	Current earnings and profits (line 1 plus line 3 minus line 4).	5a			5,314,385.
b	DASTM gain or (loss) for foreign corporations that use DASTM (see instructions).	5b			
c	Combine lines 5a and 5b and enter the result on line 5c. Then enter on lines 5c(i), 5c(ii), and 5c(iii)(A) through 5c(iii)(D) the portion of the line 5c amount with respect to the categories of income shown on those lines.	5c			5,314,385.
	(i) General category (enter amount on applicable Schedule J, Part I, line 3, column (a)).	5c(i)			
	(ii) Passive category (enter amount on applicable Schedule J, Part I, line 3, column (a)).	5c(ii)			
	(iii) Section 901(j) category:				
	(A) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(A) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(A)			
	(B) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(B) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(B)			
	(C) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(C) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(C)			
	(D) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(D) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(D)			
d	Current earnings and profits in U.S. dollars (line 5c translated at the average exchange rate, as defined in section 989(b)(3) and the related regulations (see instructions)).	5d			95,377.
e	Enter exchange rate used for line 5d.		55.7196750		

For Paperwork Reduction Act Notice, see instructions.

Schedule H (Form 5471) (Rev. 12-2021)

**SCHEDULE I-1
(Form 5471)**

(Rev. December 2021)

Department of the Treasury
Internal Revenue Service

Information for Global Intangible Low-Taxed Income

► Attach to Form 5471.

► Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471 Global Benefits Group Inc		Identifying number 20-3842750
Name of foreign corporation GLOBAL BENEFITS GROUP PROCESSING PHILIPPINES	EIN (if any)	Reference ID number (see instructions) 881804
Separate Category (Enter code - see instructions.) ► GEN		

		Functional Currency	Conversion Rate	U.S. Dollars
1 Gross income (see instructions if cost of goods sold exceed gross receipts)	1	27,920,415.		
2 Exclusions (see instructions if cost of goods sold exceed gross receipts)				
a Effectively connected income 2a				
b Subpart F income 2b				
c High-tax exception income per section 954(b)(4) 2c				
d Related party dividends 2d				
e Foreign oil and gas extraction income 2e				
3 Total exclusions (combine lines 2a through 2e) 3				
4 Gross income less total exclusions (line 1 minus line 3) (see instructions) 4		27,920,415.		
5 Deductions properly allocable to amount on line 4 5		22,361,524.		
6 Tested income (loss) (line 4 minus line 5) (see instructions) 6		5,558,891.	53.3970700	104,105.
7 Tested foreign income taxes 7			53.3970700	
8 Qualified business asset investment (QBAI) 8			53.3970700	
9a Interest expense included on line 5 9a				
b Qualified interest expense 9b				
c Tested loss QBAI amount 9c				
d Tested interest expense (line 9a minus the sum of line 9b and line 9c). If zero or less, enter -0- 9d			53.3970700	
10a Interest income included in line 4 10a		7,322.		
b Qualified interest income 10b				
c Tested interest income (line 10a minus line 10b). If zero or less, enter -0- 10c		7,322.	53.3970700	137.

For Paperwork Reduction Act Notice, see instructions.

Schedule I-1 (Form 5471) (Rev. 12-2021)

**SCHEDULE J
(Form 5471)**(Rev. December 2020)
Department of the Treasury
Internal Revenue Service**Accumulated Earnings & Profits (E&P) of Controlled Foreign Corporation**► **Attach to Form 5471.**

OMB No. 1545-0123

► **Go to www.irs.gov/Form5471 for instructions and the latest information.**

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

GLOBAL BENEFITS GROUP PROCESSING PHILIPPINES

EIN (if any)

Reference ID number (see instructions)

881804

a Separate Category (Enter code - see instructions.) ► GEN**b** If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ►**Part I Accumulated E&P of Controlled Foreign Corporation**☐ Check the box if person filing return does not have all U.S. shareholders' information to complete an amount in column (e) (see instructions).**Important:** Enter amounts in functional currency.

		(a) Post-2017 E&P Not Previously Taxed (post-2017 section 959(c)(3) balance)	(b) Post-1986 Undistributed Earnings (post-1986 and pre-2018 section 959(c)(3) balance)	(c) Pre-1987 E&P Not Previously Taxed (pre-1987 section 959(c)(3) balance)	(d) Hovering Deficit and Deduction for Suspended Taxes	(e) Previously Taxed E&P (see instructions)	
						(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP
1a	Balance at beginning of year (as reported on prior year Schedule J)	-2,882,235.					
b	Beginning balance adjustments (attach statement)						
c	Adjusted beginning balance (combine lines 1a and 1b)	-2,882,235.					
2a	Reduction for taxes unsuspended under anti-splitter rules						
b	Disallowed deduction for taxes suspended under anti-splitter rules						
3	Current year E&P (or deficit in E&P) (enter amount from applicable line 5c of Schedule H)	5,314,385.					
4	E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation						
5a	E&P carried over in nonrecognition transaction						
b	Reclassify deficit in E&P as hovering deficit after nonrecognition transaction						
6	Other adjustments (attach statement)						
7	Total current and accumulated E&P (combine lines 1c through 6)	2,432,150.					
8	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P						
9	Actual distributions						
10	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P						
11	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)						
12	Other adjustments (attach statement)						
13	Hovering deficit offset of undistributed post- transaction E&P (see instructions)						
14	Balance at beginning of next year (combine lines 7 through 13)	2,432,150.					

For Paperwork Reduction Act Notice, see the Instructions for Form 5471.**Schedule J (Form 5471) (Rev. 12-2020)**

JSA

2X1665 2.000

0001W4 X45R

Part I Accumulated E&P of Controlled Foreign Corporation (continued)

(e) Previously Taxed E&P (see instructions)					
	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP
1 a					
b					
c					
2 a					
b					
3					
4					
5 a					
b					
6					
7					
8					
9					
10					
11					
12					
13					
14					

(e) Previously Taxed E&P (see instructions)				(f)
	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP	Total Section 964(a) E&P (combine columns (a), (b), (c), and (e)(i) through (e)(x))
1 a				-2,882,235.
b				
c				-2,882,235.
2 a				
b				
3				5,314,385.
4				
5 a				
b				
6				
7				2,432,150.
8				
9				
10				
11				
12				
13				
14				2,432,150.

Part II Nonpreviously Taxed E&P Subject to Recapture as Subpart F Income (section 952(c)(2))

Important: Enter amounts in functional currency.

1	Balance at beginning of year	▶	1	
2	Additions (amounts subject to future recapture).	▶	2	
3	Subtractions (amounts recaptured in current year)	▶	3	
4	Balance at end of year (combine lines 1 through 3)	▶	4	

Schedule J (Form 5471) (Rev. 12-2020)

SCHEDULE M
(Form 5471)(Rev. December 2021)
Department of the Treasury
Internal Revenue Service**Transactions Between Controlled Foreign Corporation
and Shareholders or Other Related Persons**

OMB No. 1545-0123

▶ Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471

Identifying number

Global Benefits Group Inc

20-3842750

Name of foreign corporation

EIN (if any)

Reference ID number (see instructions)

GLOBAL BENEFITS GROUP PROCESSING PHILIPPINES

881804

Important: Complete a **separate** Schedule M for each controlled foreign corporation. Enter the totals for each type of transaction that occurred during the annual accounting period between the foreign corporation and the persons listed in columns (b) through (f). All amounts must be stated in U.S. dollars translated from functional currency at the average exchange rate for the foreign corporation's tax year. See instructions.

Enter the relevant functional currency and the exchange rate used throughout this schedule ▶

PHILIPPINES, PESO

(a) Transactions of foreign corporation	(b) U.S. person filing this return	(c) Any domestic corporation or partnership controlled by U.S. person filing this return	(d) Any other foreign corporation or partnership controlled by U.S. person filing this return	(e) 10% or more U.S. shareholder of controlled foreign corporation (other than the U.S. person filing this return)	(f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation
1 Sales of stock in trade (inventory)					
2 Sales of tangible property other than stock in trade					
3 Sales of property rights (patents, trademarks, etc.).					
4 Platform contribution transaction payments received					
5 Cost sharing transaction payments received					
6 Compensation received for technical, managerial, engineering, construction, or like services . .					
7 Commissions received					
8 Rents, royalties, and license fees received					
9 Hybrid dividends received (see instructions)					
10 Dividends received (exclude hybrid dividends, deemed distributions under subpart F, and distributions of previously taxed income)					
11 Interest received.					
12 Premiums received for insurance or reinsurance.					
13 Loan guarantee fees received .					
14 Other amounts received (attach statement)					
15 Add lines 1 through 14					
16 Purchases of stock in trade (inventory)					
17 Purchases of tangible property other than stock in trade. . . .					
18 Purchases of property rights (patents, trademarks, etc.) . . .					
19 Platform contribution transaction payments paid					
20 Cost sharing transaction payments paid .					
21 Compensation paid for technical, managerial, engineering, construction, or like services . .					
22 Commissions paid					
23 Rents, royalties, and license fees paid					
24 Hybrid dividends paid (see instructions)					
25 Dividends paid (exclude hybrid dividends paid)					
26 Interest paid					
27 Premiums paid for insurance or reinsurance					
28 Loan guarantee fees paid . . .					
29 Other amounts paid (attach statement). .					
30 Add lines 16 through 29. . . .					

For Paperwork Reduction Act Notice, see the Instructions for Form 5471.

Schedule M (Form 5471) (Rev. 12-2021)

Schedule M (Form 5471) (Rev. 12-2021)

Page 2

Name of person filing Form 5471

Identifying number

(a) Transactions of foreign corporation	(b) U.S. person filing this return	(c) Any domestic corporation or partnership controlled by U.S. person filing this return	(d) Any other foreign corporation or partnership controlled by U.S. person filing this return	(e) 10% or more U.S. shareholder of controlled foreign corporation (other than the U.S. person filing this return)	(f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation
31 Accounts Payable	95,037.				
32 Amounts borrowed (enter the maximum loan balance during the year) - see instructions					
33 Accounts Receivable					
34 Amounts loaned (enter the maximum loan balance during the year) - see instructions					

Schedule M (Form 5471) (Rev. 12-2021)

**SCHEDULE P
(Form 5471)**

(Rev. December 2020)

Department of the Treasury
Internal Revenue Service**Previously Taxed Earnings and Profits of U.S. Shareholder
of Certain Foreign Corporations**

▶ Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471

Global Benefits Group Inc

Name of U.S. shareholder

Global Benefits Group Inc

Name of foreign corporation

GLOBAL BENEFITS GROUP PROCESSING PHILIPPINES

EIN (if any)

Identifying number

20-3842750

Identifying number

20-3842750

Reference ID number (see instructions)

881804

a Separate Category (Enter code - see instructions.) ▶

GEN

b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶**Part I Previously Taxed E&P in Functional Currency** (see instructions)

		(a) Reclassified section 965(a) PTEP	(b) Reclassified section 965(b) PTEP	(c) General section 959(c)(1) PTEP
1a	Balance at beginning of year (see instructions)			
b	Beginning balance adjustments (attach statement)			
c	Adjusted beginning balance (combine lines 1a and 1b)			
2	Reduction for taxes unsuspended under anti-splitter rules			
3	Previously taxed E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation			
4	Previously taxed E&P carried over in nonrecognition transaction			
5	Other adjustments (attach statement)			
6	Total previously taxed E&P (combine lines 1c through 5)			
7	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P			
8	Actual distributions of previously taxed E&P			
9	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P			
10	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)			
11	Other adjustments (attach statement)			
12	Balance at beginning of next year (combine lines 6 through 11)			

For Paperwork Reduction Act Notice, see instructions.

Schedule P (Form 5471) (Rev. 12-2020)

Part I **Previously Taxed E&P in Functional Currency** (see instructions) *(continued)*

	(d) Reclassified section 951A PTEP	(e) Reclassified section 245A(d) PTEP	(f) Section 965(a) PTEP	(g) Section 965(b) PTEP	(h) Section 951A PTEP	(i) Section 245A(d) PTEP	(j) Section 951(a)(1)(A) PTEP	(k) Total
1a								
b								
c								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								

Part II Previously Taxed E&P in U.S. Dollars

		(a) Reclassified section 965(a) PTEP	(b) Reclassified section 965(b) PTEP	(c) General section 959(c)(1) PTEP
1 a	Balance at beginning of year (see instructions)			
b	Beginning balance adjustments (attach statement)			
c	Adjusted beginning balance (combine lines 1a and 1b)			
2	Reduction for taxes unsuspended under anti-splitter rules			
3	Previously taxed E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation			
4	Previously taxed E&P carried over in nonrecognition transaction			
5	Other adjustments (attach statement)			
6	Total previously taxed E&P (combine lines 1c through 5)			
7	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P			
8	Actual distributions of previously taxed E&P			
9	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P			
10	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)			
11	Other adjustments (attach statement)			
12	Balance at beginning of next year (combine lines 6 through 11)			

Schedule P (Form 5471) (Rev. 12-2020)

Part II **Previously Taxed E&P in U.S. Dollars** *(continued)*

	(d) Reclassified section 951A PTEP	(e) Reclassified section 245A(d) PTEP	(f) Section 965(a) PTEP	(g) Section 965(b) PTEP	(h) Section 951A PTEP	(i) Section 245A(d) PTEP	(j) Section 951(a)(1)(A) PTEP	(k) Total
1a								
b								
c								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								

Schedule P (Form 5471) (Rev. 12-2020)

**SCHEDULE Q
(Form 5471)**(Rev. December 2022)
Department of the Treasury
Internal Revenue Service**CFC Income by CFC Income Groups**

Attach to Form 5471.

OMB No. 1545-0123

Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

GLOBAL BENEFITS GROUP PROCESSING PHILIPPINES

EIN (if any)

Reference ID number (see instructions)

881804

Complete a separate Schedule Q with respect to each applicable category of income (see instructions).

A Enter separate category code with respect to which this Schedule Q is being completed (see instructions for codes) GEN**B** If category code "PAS" is entered on line A, enter the applicable grouping code (see instructions)**C** If code "901j" is entered on line A, enter the country code for the sanctioned country (see instructions)

Complete a separate Schedule Q for U.S. source income and foreign source income (see instructions for an exception).

D Indicate whether this Schedule Q is being completed for: ☐ U.S. source income or ☒ Foreign source income

Complete a separate Schedule Q for FOGEI or FORI income.

E If this Schedule Q is being completed for FOGEI or FORI income, check this box ☐Enter amounts in functional currency
of the foreign corporation (unless
otherwise noted).

	(i) Country Code	(ii) Gross Income	(iii) Definitely Related Expenses	(iv) Related Person Interest Expense	(v) Other Interest Expense	(vi) Research & Experimental Expenses	(vii) Other Expenses (attach schedule)
1 Subpart F Income Groups							
a Dividends, Interest, Rents, Royalties, & Annuities (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
b Net Gain From Certain Property Transactions (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
c Net Gain From Commodities Transactions (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
d Net Foreign Currency Gain (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
e Income Equivalent to Interest (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
f Other							
(1) Unit name: _____							
(2) Unit name: _____							
g Foreign Base Company Sales Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							

Important: See **Computer-Generated Schedule Q** in instructions.

For Paperwork Reduction Act Notice, see instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

JSA

2X1650 3.000

0001W4 X45R

Schedule Q (Form 5471) (Rev. 12-2022)

Page **2**

	(viii) Current Year Tax on Reattributed Income From Disregarded Payments	(ix) Current Year Tax on All Other Disregarded Payments	(x) Other Current Year Taxes	(xi) Net Income (column (ii) less columns (iii) through (x))	(xii) Foreign Taxes for Which Credit Allowed (U.S. Dollars)	(xiii) Average Asset Value	(xiv) High Tax Election	(xv) Loss Allocation	(xvi) Net Income After Loss Allocation (column (xi) minus column (xv))
1									
a									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
b									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
c									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
d									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
e									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
f									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
g									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		

Important: See **Computer-Generated Schedule Q** in instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

Schedule Q (Form 5471) (Rev. 12-2022)

Page **3**

Enter amounts in functional currency of the foreign corporation (unless otherwise noted).

	(i) Country Code	(ii) Gross Income	(iii) Definitely Related Expenses	(iv) Related Person Interest Expense	(v) Other Interest Expense	(vi) Research & Experimental Expenses	(vii) Other Expenses (attach schedule)
1 Subpart F Income Groups							
h Foreign Base Company Services Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
i Full Inclusion Foreign Base Company Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
j Insurance Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
k International Boycott Income							
l Bribes, Kickbacks, and Other Payments							
m Section 901(j) income							
2 Recaptured Subpart F Income							
3 Tested Income Group (Total)		27,920,415.					22,361,524.
(1) Unit name: Tested Income	RP	27,920,415.					22,361,524.
(2) Unit name: _____							
4 Residual Income Group (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
5 Total		27,920,415.					22,361,524.

Important: See **Computer-Generated Schedule Q** in instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

Schedule Q (Form 5471) (Rev. 12-2022)

Page **4**

	(viii) Current Year Tax on Reattributed Income From Disregarded Payments	(ix) Current Year Tax on All Other Disregarded Payments	(x) Other Current Year Taxes	(xi) Net Income (column (ii) less columns (iii) through (x))	(xii) Foreign Taxes for Which Credit Allowed (U.S. Dollars)	(xiii) Average Asset Value	(xiv) High Tax Election	(xv) Loss Allocation	(xvi) Net Income After Loss Allocation (column (xi) minus column (xv))
1									
h									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
i									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
j									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
k									
l									
m									
2									
3				5,558,891.					5,558,891.
(1)				5,558,891.			<input type="checkbox"/>		5,558,891.
(2)							<input type="checkbox"/>		
4									
(1)									
(2)									
5				5,558,891.					5,558,891.

Important: See **Computer-Generated Schedule Q** in instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

**SCHEDULE R
(Form 5471)**

(December 2020)
Department of the Treasury
Internal Revenue Service

Distributions From a Foreign Corporation

► Attach to Form 5471.

OMB No. 1545-0123

► Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471		Identifying number
Global Benefits Group Inc		20-3842750
Name of foreign corporation	EIN (if any)	Reference ID number (see instructions)
GLOBAL BENEFITS GROUP PROCESSING PHILIPPINES		881804

	(a) Description of distribution	(b) Date of distribution	(c) Amount of distribution in foreign corporation's functional currency	(d) Amount of E&P distribution in foreign corporation's functional currency
1	No Distributions	12/31/2022	NONE	NONE
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				

Form **5471**

(Rev. December 2022)

Department of the Treasury
Internal Revenue Service**Information Return of U.S. Persons With Respect
to Certain Foreign Corporations**Go to www.irs.gov/Form5471 for instructions and the latest information.Information furnished for the foreign corporation's annual accounting period (tax year required by
section 898) (see instructions) beginning 01/01/2022 , and ending 12/31/2022

OMB No. 1545-0123

Attachment
Sequence No. **121**

Name of person filing this return

Global Benefits Group Inc

Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address)

27051 Towne Centre Drive, #210

City or town, state, and ZIP code

FOOTHILL RANCH, CA 92610

Filer's tax year beginning 01/01/2022 , and ending 12/31/2022

D Check box if this is a final Form 5471 for the foreign corporation ☐**E** Check if any excepted specified foreign financial assets are reported on this form (see instructions). ☐**F** Check the box if this Form 5471 has been completed using "Alternative Information" under Rev. Proc. 2019-40 ☐**G** If the box on line F is checked, enter the corresponding code for "Alternative Information" (see instructions)**H** Person(s) on whose behalf this information return is filed:

(1) Name	(2) Address	(3) Identifying number	(4) Check applicable box(es)		
			Shareholder	Officer	Director
GLOBAL BENEFITS GROUP, INC	27422 PORTOLA PARKWAY, FOOTHILL RANCH CA 92610	20-3842750	X		

Important: Fill in all applicable lines and schedules. All information **must** be in English. All amounts **must** be stated in U.S. dollars unless otherwise indicated.

1a Name and address of foreign corporation GLOBAL BENEFITS GROUP (UK) LIMITED Suite 102 7th Floor, 8 Devonshire Square London, EC2M 4PL UK				b(1) Employer identification number, if any	
				b(2) Reference ID number (see instructions) 00001	
				c Country under whose laws incorporated UK	
d Date of incorporation 02/04/2016	e Principal place of business UK	f Principal business activity code number 542140	g Principal business activity BROKERING & MANAGEMENT	h Functional currency code GBP	

2 Provide the following information for the foreign corporation's accounting period stated above.

a Name, address, and identifying number of branch office or agent (if any) in the United States	b If a U.S. income tax return was filed, enter:	
	(i) Taxable income or (loss)	(ii) U.S. income tax paid (after all credits)
c Name and address of foreign corporation's statutory or resident agent in country of incorporation	d Name and address (including corporate department, if applicable) of person (or persons) with custody of the books and records of the foreign corporation, and the location of such books and records, if different	

Schedule A Stock of the Foreign Corporation

(a) Description of each class of stock	(b) Number of shares issued and outstanding	
	(i) Beginning of annual accounting period	(ii) End of annual accounting period
COMMON	100.	100.

For Paperwork Reduction Act Notice, see instructions.

Form **5471** (Rev. 12-2022)

(a) Name, address, and identifying number of shareholder

(c) Number of shares held at beginning of annual accounting period	
--	--

(d) Number of shares held at end of annual accounting period
--

(e) Pro rata share
of subpart F
income (enter as
a percentage)

COMMON STOCK

100.

100.

100.00000000000000

(a) Name, address, and identifying number of shareholder.
Also, include country of incorporation
or formation, if applicable.

(c) Number of shares held at beginning of annual accounting period	
--	--

(d) Number of shares held at end of annual accounting period

COMMON STOCK

100.

100.

Schedule C Income Statement (see instructions)

Important: Report all information in functional currency in accordance with U.S. generally accepted accounting principles (GAAP). Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules). However, if the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for dollar approximate separate transactions method (DASTM) corporations.

			Functional Currency	U.S. Dollars
Income	1a Gross receipts or sales	1a		
	b Returns and allowances	1b		
	c Subtract line 1b from line 1a	1c		
	2 Cost of goods sold	2		
	3 Gross profit (subtract line 2 from line 1c)	3		
	4 Dividends	4		
	5 Interest	5		
	6a Gross rents	6a		
	b Gross royalties and license fees	6b		
	7 Net gain or (loss) on sale of capital assets	7		
Deductions	8a Foreign currency transaction gain or loss - unrealized	8a		
	b Foreign currency transaction gain or loss - realized	8b	-15,113.	-19,269.
	9 Other income (attach statement) See Statement 44	9	3,416,106.	4,355,500.
	10 Total income (add lines 3 through 9)	10	3,400,993.	4,336,231.
	11 Compensation not deducted elsewhere	11	2,440,180.	3,111,205.
	12a Rents	12a	276,348.	352,341.
	b Royalties and license fees	12b		
	13 Interest	13		
	14 Depreciation not deducted elsewhere	14	62,592.	79,804.
	15 Depletion	15		
Net Income	16 Taxes (exclude income tax expense (benefit)) Stmt. 44	16	328,656.	419,033.
	17 Other deductions (attach statement - exclude income tax expense (benefit)) See Statement 44	17	650,224.	829,030.
	18 Total deductions (add lines 11 through 17)	18	3,758,000.	4,791,413.
	19 Net income or (loss) before unusual or infrequently occurring items, and income tax expense (benefit) (subtract line 18 from line 10) . .	19	-357,007.	-455,180.
	20 Unusual or infrequently occurring items	20		
Other Comprehensive Income	21a Income tax expense (benefit) - current	21a		
	b Income tax expense (benefit) - deferred	21b		
	22 Current year net income or (loss) per books (combine lines 19 through 21b) .	22	-357,007.	-455,180.
Other Comprehensive Income	23a Foreign currency translation adjustments	23a		
	b Other	23b		
	c Income tax expense (benefit) related to other comprehensive income	23c		
	24 Other comprehensive income (loss), net of tax (line 23a plus line 23b less line 23c)	24		

Schedule F Balance Sheet**Important:** Report all amounts in U.S. dollars prepared and translated in accordance with U.S. GAAP. See instructions for an exception for DASTM corporations.

Assets		(a) Beginning of annual accounting period	(b) End of annual accounting period
1 Cash	1	32,540.	4,736.
2a Trade notes and accounts receivable	2a	155,530.	8,841.
b Less allowance for bad debts	2b	() ()	
3 Derivatives	3		
4 Inventories	4		
5 Other current assets (attach statement). See Statement 46.	5	98,383.	-93,311.
6 Loans to shareholders and other related persons	6		
7 Investment in subsidiaries (attach statement).	7		
8 Other investments (attach statement)	8		
9a Buildings and other depreciable assets	9a	641,811.	1,415,429.
b Less accumulated depreciation.	9b	(10,534.) (90,337).	
10a Depletable assets	10a		
b Less accumulated depletion	10b	() ()	
11 Land (net of any amortization)	11		
12 Intangible assets:			
a Goodwill	12a		
b Organization costs.	12b		
c Patents, trademarks, and other intangible assets	12c		
d Less accumulated amortization for lines 12a, 12b, and 12c	12d	() ()	
13 Other assets (attach statement) See Statement 46.	13	188,867.	NONE
14 Total assets	14	1,106,597.	1,245,358.
Liabilities and Shareholders' Equity			
15 Accounts payable	15		
16 Other current liabilities (attach statement) See Statement 46.	16	548,255.	1,142,196.
17 Derivatives	17		
18 Loans from shareholders and other related persons	18		
19 Other liabilities (attach statement)	19		
20 Capital stock:			
a Preferred stock	20a		
b Common stock	20b	924,454.	924,454.
21 Paid-in or capital surplus (attach reconciliation)	21		
22 Retained earnings	22	-366,112.	-821,292.
23 Less cost of treasury stock	23	() ()	
24 Total liabilities and shareholders' equity	24	1,106,597.	1,245,358.

Schedule G Other Information

	Yes	No
1 During the tax year, did the foreign corporation own at least a 10% interest, directly or indirectly, in any foreign partnership? If "Yes," see the instructions for required statement.		X
2 During the tax year, did the foreign corporation own an interest in any trust?		X
3 During the tax year, did the foreign corporation own any foreign entities that were disregarded as separate from their owner under Regulations sections 301.7701-2 and 301.7701-3 or did the foreign corporation own any foreign branches (see instructions)? If "Yes," you are generally required to attach Form 8858 for each entity or branch (see instructions).		X
4a During the tax year, did the filer pay or accrue any base erosion payment under section 59A(d) to the foreign corporation or did the filer have a base erosion tax benefit under section 59A(c)(2) with respect to a base erosion payment made or accrued to the foreign corporation (see instructions)? If "Yes," complete lines 4b and 4c.		X
b Enter the total amount of the base erosion payments. \$ _____		
c Enter the total amount of the base erosion tax benefit \$ _____		
5a During the tax year, did the foreign corporation pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? If "Yes," complete line 5b.		X
b Enter the total amount of the disallowed deductions (see instructions) \$ _____		

Schedule G Other Information (continued)

	Yes	No
6a Is the filer claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any transactions with the foreign corporation? If "Yes," complete lines 6b, 6c, and 6d. See instructions.		X
b Enter the amount of gross receipts derived from all sales of general property to the foreign corporation that the filer included in its computation of foreign-derived deduction eligible income (FDDEI) \$ _____		
c Enter the amount of gross income derived from a license of property to the foreign corporation that the filer included in its computation of FDDEI (see instructions) \$ _____		
d Enter the amount of gross income derived from services provided to the foreign corporation that the filer included in its computation of FDDEI (see instructions) \$ _____		
7 During the tax year, was the foreign corporation a participant in any cost sharing arrangement? If the answer to question 7 is "Yes," complete a separate Schedule G-1 for each cost sharing arrangement in which the foreign corporation was a participant during the tax year.		X
8 From April 25, 2014, to December 31, 2017, did the foreign corporation purchase stock or securities of a shareholder of the foreign corporation for use in a triangular reorganization (within the meaning of Regulations section 1.358-6(b)(2))?		X
9a Did the foreign corporation receive any intangible property in a prior year or the current tax year for which the U.S. transferor is required to report a section 367(d) annual income inclusion for the taxable year? If "Yes," go to line 9b.		X
b Enter in functional currency the amount of the earnings and profits reduction pursuant to section 367(d)(2)(B) for the tax year \$ _____		
10 During the tax year, was the foreign corporation an expatriated foreign subsidiary under Regulations section 1.7874-12(a)(9)? If "Yes," see instructions and attach statement.		X
11 During the tax year, did the foreign corporation participate in any reportable transaction as defined in Regulations section 1.6011-4? If "Yes," attach Form(s) 8886 if required by Regulations section 1.6011-4(c)(3)(i)(G).		X
12 During the tax year, did the foreign corporation pay or accrue any foreign tax that was disqualified for credit under section 901(m)?		X
13 During the tax year, did the foreign corporation pay or accrue foreign taxes to which section 909 applies, or treat foreign taxes that were previously suspended under section 909 as no longer suspended?		X
14 Did you answer "Yes" to any of the questions in the instructions for line 14? If "Yes," enter the corresponding code(s) from the instructions and attach statement _____		X
15 Does the foreign corporation have interest expense disallowed under section 163(j) (see instructions)? If "Yes," enter the amount \$ _____		X
16 Does the foreign corporation have previously disallowed interest expense under section 163(j) carried forward to the current tax year (see instructions)? If "Yes," enter the amount \$ _____		X
17a Did any extraordinary reduction with respect to a controlling section 245A shareholder occur during the tax year (see instructions)?		X
b If the answer to question 17a is "Yes," was an election made to close the tax year such that no amount is treated as an extraordinary reduction amount or tiered extraordinary reduction amount (see instructions)?		
18 Does the reporting corporation have any loan to or from the related party to which the safe-haven rate rules of Regulations section 1.482-2(a)(2)(iii)(B) are applicable, and for which the reporting corporation used a rate of interest within the safe-haven range of Regulations section 1.482-2(a)(2)(iii)(B)(1) (100% to 130% of the AFR for the relevant term)?		X
19a Did the reporting corporation make at least one distribution or acquisition (as defined by Regulations section 1.385-3) during the period including the tax year and the preceding 3 tax years, or, during the period beginning 36 months before the date of the respective distribution or acquisition and ending 36 months afterward, did the reporting corporation issue or refinance indebtedness owed to a related party?		X
b If the answer to question 19a is "Yes," provide the following. (1) The amount of such distribution(s) and acquisition(s) \$ _____ (2) The amount of such related party indebtedness \$ _____		

Schedule I Summary of Shareholder's Income From Foreign Corporation (see instructions)

If item H on page 1 is completed, a separate Schedule I must be filed for each Category 4, 5a, or 5b filer for whom reporting is furnished on this Form 5471. This Schedule I is being completed for:

Name of U.S. shareholder Global Benefits Group Inc

Identifying number 20-3842750

1a	Section 964(e)(4) subpart F dividend income from the sale of stock of a lower-tier foreign corporation (see instructions)	1a	
b	Section 245A(e)(2) subpart F income from hybrid dividends of tiered corporations (see instructions) . . .	1b	
c	Subpart F income from tiered extraordinary disposition amounts not eligible for subpart F exception under section 954(c)(6)	1c	
d	Subpart F income from tiered extraordinary reduction amounts not eligible for subpart F exception under section 954(c)(6)	1d	
e	Section 954(c) Subpart F Foreign Personal Holding Company Income (enter result from Worksheet A) . .	1e	
f	Section 954(d) Subpart F Foreign Base Company Sales Income (enter result from Worksheet A)	1f	
g	Section 954(e) Subpart F Foreign Base Company Services Income (enter result from Worksheet A) . .	1g	
h	Other subpart F income (enter result from Worksheet A)	1h	
2	Earnings invested in U.S. property (enter the result from Worksheet B)	2	
3	Reserved for future use	3	
4	Factoring income See instructions for reporting amounts on lines 1, 2, and 4 on your income tax return.	4	
5a	Section 245A eligible dividends (see instructions)	5a	
b	Extraordinary disposition amounts (see instructions)	5b	
c	Extraordinary reduction amounts (see instructions)	5c	
d	Section 245A(e) dividends (see instructions)	5d	
e	Dividends not reported on line 5a, 5b, 5c, or 5d	5e	
6	Exchange gain or (loss) on a distribution of previously taxed earnings and profits	6	

	Yes	No
7a Was any income of the foreign corporation blocked?		
b Did any such income become unblocked during the tax year (see section 964(b))?		
If the answer to either question is "Yes," attach an explanation.		
8a Did this U.S. shareholder have an extraordinary disposition (ED) account with respect to the foreign corporation at any time during the tax year (see instructions)?		
b If the answer to question 8a is "Yes," enter the U.S. shareholder's ED account balance at the beginning of the CFC year \$ _____ and at the end of the tax year \$ _____. Provide an attachment detailing any changes from the beginning to the ending balances.		
c Enter the CFC's aggregate ED account balance with respect to all U.S. shareholders at the beginning of the CFC year \$ _____ and at the end of the tax year \$ _____. Provide an attachment detailing any changes from the beginning to the ending balances.		
9 Enter the sum of the hybrid deduction accounts with respect to stock of the foreign corporation (see instructions) \$ _____		

Form **5471** (Rev. 12-2022)

**SCHEDULE E
(Form 5471)**

(Rev. December 2021)

Department of the Treasury
Internal Revenue Service**Income, War Profits, and Excess Profits Taxes Paid or Accrued**

▶ Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471

Global Benefits Group Inc

Name of foreign corporation

GLOBAL BENEFITS GROUP (UK) LIMITED

Identifying number

20-3842750

Reference ID number (see instructions)

00001

a Separate Category (Enter code - see instructions.) ▶ GEN

b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions). ▶

c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶

Part I Taxes for Which a Foreign Tax Credit Is Allowed**Section 1 - Taxes Paid or Accrued Directly by Foreign Corporation**

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Unsuspended Taxes	(d) Country or U.S. Possession to Which Tax Is Paid (Enter code - see instructions. Use a separate line for each.)	(e) Foreign Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)	(f) U.S. Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)
1	GBG UK LIMITED	00001		UK	2022/01/01	2022/12/31
2						
3						
4						

	(g) Income Subject to Tax in the Foreign Jurisdiction (see instructions)	(h) If taxes are paid on U.S. source income, check box	(i) Local Currency in Which Tax Is Payable (enter code - see instructions)	(j) Tax Paid or Accrued (in local currency in which the tax is payable)	(k) Conversion Rate to U.S. Dollars	(l) In U.S. Dollars (divide column (j) by column (k))	(m) In Functional Currency of Foreign Corporation
1	NONE		GBP	NONE	0.7843200	NONE	NONE
2							
3							
4							
5	Total (combine lines 1 through 4 of column (l)). Also report amount on Schedule E-1, line 4 ▶					NONE	
6	Total (combine lines 1 through 4 of column (m)) ▶						NONE

Section 2 - Taxes Deemed Paid by Foreign Corporation

	(a) Name of Lower-Tier Distributing Foreign Corporation	(b) EIN or Reference ID Number of Lower-Tier Distributing Foreign Corporation	(c) Country or U.S. Possession to Which Tax Is Paid (Enter code - see instructions. Use a separate line for each.)	(d) PTEP Group (enter code)	(e) Annual PTEP Account (enter year)
1					
2					
3					
4					

	(f) PTEP Distributed (enter amount in functional currency)	(g) Total Amount of PTEP in the PTEP Group (in functional currency)	(h) Total Amount of the PTEP Group Taxes With Respect to PTEP Group (USD)	(i) Foreign Income Taxes Properly Attributable to PTEP and not Previously Deemed Paid ((column (f)/column (g)) x column (h)) (USD)
1				
2				
3				
4				
5	Total (combine lines 1 through 4 of column (i)). Also report amount on Schedule E-1, line 6 ▶			

For Paperwork Reduction Act Notice, see instructions.

Schedule E (Form 5471) (Rev. 12-2021)

JSA

2X1666 2.000

0001W4 X45R

Name of foreign corporation

GLOBAL BENEFITS GROUP (UK) LIMITED

EIN (if any)

Reference ID number (see instructions)

00001

- a Separate Category (Enter code-see instructions). **GEN**
- b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions)
- c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions)

Part II Election

For tax years beginning after December 31, 2004, has an election been made under section 986(a)(1)(D) to translate taxes using the exchange rate on the date of payment?

☐ Yes ☒ No If "Yes," state date of election ►
Part III Taxes for Which a Foreign Tax Credit Is Disallowed (Enter in functional currency of foreign corporation.)

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Section 901(j)	(d) Section 901(k) and (l)	(e) Section 901(m)	(f) U.S. Taxes	(g) Suspended Taxes	(h) Other	(i) Total
1									
2									
3	In functional currency (combine lines 1 and 2)								►
4	In U.S. dollars (translated at the average exchange rate, as defined in section 989(b)(3) and related regulations (see instructions)).								►

Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Earnings and Profits (E&P) of Foreign Corporation**IMPORTANT:** Enter amounts in U.S. dollars.

		Taxes related to:			
		(a) Subpart F Income	(b) Tested Income	(c) Residual Income	(d) Suspended Taxes
1a	Balance at beginning of year (as reported in prior year Schedule E-1)	-0-	-0-	-0-	
b	Beginning balance adjustments (attach statement).				
c	Adjusted beginning balance (combine lines 1a and 1b)				
2	Adjustment for foreign tax redetermination.				
3a	Taxes unsuspended under anti-splitter rules				
b	Taxes suspended under anti-splitter rules.				
4	Taxes reported on Schedule E, Part I, Section 1, line 5, column (l)				
5	Taxes carried over in nonrecognition transactions				
6	Taxes reported on Schedule E, Part I, Section 2, line 5, column (i).				
7	Other adjustments (attach statement).				
8	Taxes paid or accrued on current income/E&P or accumulated E&P (combine lines 1c through 7)				
9	Taxes deemed paid with respect to inclusions (see instructions)				
10	Taxes deemed paid with respect to actual distributions				
11	Taxes on amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P				
12	Other (attach statement).				
13	Balance of taxes paid or accrued (combine lines 8 through 12 in columns (a), (b), and (c))				
14	Reserved for future use				
15	Reduction for other taxes not deemed paid.				
16	Balance of taxes paid or accrued at the beginning of the next year. Line 16, columns (a), (b), and (c) must always equal zero. So, if necessary, enter negative amounts on line 15 of columns (a), (b), and (c) in amounts sufficient to reduce line 13, columns (a), (b), and (c) to zero. For the remaining columns, combine lines 8 through 12	-0-	-0-	-0-	

Schedule E (Form 5471) (Rev. 12-2021)

Page 3

Name of foreign corporation	EIN (if any)	Reference ID number (see instructions)
GLOBAL BENEFITS GROUP (UK) LIMITED		00001

- a Separate Category (Enter code - see instructions.) ▶ GEN
- b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶
- c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶

Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Accumulated Earnings and Profits (E&P) of Foreign Corporation (continued)

(e) Taxes related to previously taxed E&P (see instructions)										
	(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP
1a										
b										
c										
2										
3a										
b										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										

Schedule E (Form 5471) (Rev. 12-2021)

Document Page 174 of 322
Current Earnings and Profits**SCHEDULE H**
(Form 5471)(Rev. December 2021)
Department of the Treasury
Internal Revenue Service

▶ Attach to Form 5471.

OMB No. 1545-0123

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

GLOBAL BENEFITS GROUP (UK) LIMITED

EIN (if any)

Reference ID number (see instructions)

00001

IMPORTANT: Enter the amounts on lines 1 through 5c in **functional** currency.

1	Current year net income or (loss) per foreign books of account.		1	-357,007.
2	Net adjustments made to line 1 to determine current earnings and profits according to U.S. financial and tax accounting standards (see instructions):	Net Additions	Net Subtractions	
a	Capital gains or losses.	2a		
b	Depreciation and amortization.	2b	17,656.	
c	Depletion.	2c		
d	Investment or incentive allowance.	2d		
e	Charges to statutory reserves.	2e		
f	Inventory adjustments.	2f		
g	Income taxes (see Schedule E, Part I, Section 1, line 6, column (m), and Part III, line 3, column (i)).	2g		
h	Foreign currency gains or losses.	2h		
i	Other (attach statement).	2i		
3	Total net additions.	3	17,656.	
4	Total net subtractions.	4		
5a	Current earnings and profits (line 1 plus line 3 minus line 4).	5a		-339,351.
b	DASTM gain or (loss) for foreign corporations that use DASTM (see instructions).	5b		
c	Combine lines 5a and 5b and enter the result on line 5c. Then enter on lines 5c(i), 5c(ii), and 5c(iii)(A) through 5c(iii)(D) the portion of the line 5c amount with respect to the categories of income shown on those lines.	5c		-339,351.
	(i) General category (enter amount on applicable Schedule J, Part I, line 3, column (a)).	5c(i)		
	(ii) Passive category (enter amount on applicable Schedule J, Part I, line 3, column (a)).	5c(ii)		
	(iii) Section 901(j) category:			
	(A) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(A) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(A)		
	(B) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(B) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(B)		
	(C) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(C) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(C)		
	(D) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(D) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(D)		
d	Current earnings and profits in U.S. dollars (line 5c translated at the average exchange rate, as defined in section 989(b)(3) and the related regulations (see instructions)).	5d		-409,962.
e	Enter exchange rate used for line 5d. ▶		0.8277630	

For Paperwork Reduction Act Notice, see instructions.

Schedule H (Form 5471) (Rev. 12-2021)

**SCHEDULE I-1
(Form 5471)**

(Rev. December 2021)

Department of the Treasury
Internal Revenue Service**Information for Global Intangible Low-Taxed Income**

► Attach to Form 5471.

► Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

GLOBAL BENEFITS GROUP (UK) LIMITED

EIN (if any)

Reference ID number (see instructions)

00001

Separate Category (Enter code - see instructions.)

► GEN

		Functional Currency	Conversion Rate	U.S. Dollars
1 Gross income (see instructions if cost of goods sold exceed gross receipts)	1	3,400,993.		
2 Exclusions (see instructions if cost of goods sold exceed gross receipts)				
a Effectively connected income	2a			
b Subpart F income	2b			
c High-tax exception income per section 954(b)(4)	2c			
d Related party dividends	2d			
e Foreign oil and gas extraction income	2e			
3 Total exclusions (combine lines 2a through 2e)	3			
4 Gross income less total exclusions (line 1 minus line 3) (see instructions)	4	3,400,993.		
5 Deductions properly allocable to amount on line 4	5	3,727,496.		
6 Tested income (loss) (line 4 minus line 5) (see instructions)	6	-326,503.	0.7843200	-416,288.
7 Tested foreign income taxes	7		0.7843200	
8 Qualified business asset investment (QBAI)	8		0.7843200	
9a Interest expense included on line 5	9a			
b Qualified interest expense	9b			
c Tested loss QBAI amount	9c			
d Tested interest expense (line 9a minus the sum of line 9b and line 9c). If zero or less, enter -0-	9d		0.7843200	
10a Interest income included in line 4	10a			
b Qualified interest income	10b			
c Tested interest income (line 10a minus line 10b). If zero or less, enter -0-	10c		0.7843200	

For Paperwork Reduction Act Notice, see instructions.

Schedule I-1 (Form 5471) (Rev. 12-2021)

**SCHEDULE J
(Form 5471)**(Rev. December 2020)
Department of the Treasury
Internal Revenue Service**Accumulated Earnings & Profits (E&P) of Controlled Foreign Corporation**► **Attach to Form 5471.**

OMB No. 1545-0123

► **Go to www.irs.gov/Form5471 for instructions and the latest information.**

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

GLOBAL BENEFITS GROUP (UK) LIMITED

EIN (if any)

Reference ID number (see instructions)

00001

a Separate Category (Enter code - see instructions.) ► GEN**b** If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ►**Part I Accumulated E&P of Controlled Foreign Corporation**☐ Check the box if person filing return does not have all U.S. shareholders' information to complete an amount in column (e) (see instructions).**Important:** Enter amounts in functional currency.

		(a) Post-2017 E&P Not Previously Taxed (post-2017 section 959(c)(3) balance)	(b) Post-1986 Undistributed Earnings (post-1986 and pre-2018 section 959(c)(3) balance)	(c) Pre-1987 E&P Not Previously Taxed (pre-1987 section 959(c)(3) balance)	(d) Hovering Deficit and Deduction for Suspended Taxes	(e) Previously Taxed E&P (see instructions)	
						(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP
1a	Balance at beginning of year (as reported on prior year Schedule J)	421,333.					
b	Beginning balance adjustments (attach statement)						
c	Adjusted beginning balance (combine lines 1a and 1b)	421,333.					
2a	Reduction for taxes unsuspended under anti-splitter rules						
b	Disallowed deduction for taxes suspended under anti-splitter rules						
3	Current year E&P (or deficit in E&P) (enter amount from applicable line 5c of Schedule H)	-339,351.					
4	E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation						
5a	E&P carried over in nonrecognition transaction						
b	Reclassify deficit in E&P as hovering deficit after nonrecognition transaction						
6	Other adjustments (attach statement)						
7	Total current and accumulated E&P (combine lines 1c through 6)	81,982.					
8	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P						
9	Actual distributions						
10	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P						
11	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)						
12	Other adjustments (attach statement)						
13	Hovering deficit offset of undistributed post- transaction E&P (see instructions)						
14	Balance at beginning of next year (combine lines 7 through 13)	81,982.					

For Paperwork Reduction Act Notice, see the Instructions for Form 5471.**Schedule J (Form 5471) (Rev. 12-2020)**

JSA

2X1665 2.000

0001W4 X45R

Part I Accumulated E&P of Controlled Foreign Corporation (continued)

(e) Previously Taxed E&P (see instructions)					
	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP
1 a					
b					
c					
2 a					
b					
3					
4					
5 a					
b					
6					
7					
8					
9					
10					
11					
12					
13					
14					

(e) Previously Taxed E&P (see instructions)				(f)
	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP	Total Section 964(a) E&P (combine columns (a), (b), (c), and (e)(i) through (e)(x))
1 a				421,333.
b				
c				421,333.
2 a				
b				
3				-339,351.
4				
5 a				
b				
6				
7				81,982.
8				
9				
10				
11				
12				
13				
14				81,982.

Part II **Nonpreviously Taxed E&P Subject to Recapture as Subpart F Income (section 952(c)(2))**

Important: Enter amounts in functional currency.

1	Balance at beginning of year	▶	1	
2	Additions (amounts subject to future recapture).	▶	2	
3	Subtractions (amounts recaptured in current year)	▶	3	
4	Balance at end of year (combine lines 1 through 3)	▶	4	

Schedule J (Form 5471) (Rev. 12-2020)

SCHEDULE M
(Form 5471)(Rev. December 2021)
Department of the Treasury
Internal Revenue Service**Transactions Between Controlled Foreign Corporation
and Shareholders or Other Related Persons**

OMB No. 1545-0123

▶ Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471

Identifying number

Global Benefits Group Inc

20-3842750

Name of foreign corporation

EIN (if any)

Reference ID number (see instructions)

GLOBAL BENEFITS GROUP (UK) LIMITED

00001

Important: Complete a **separate** Schedule M for each controlled foreign corporation. Enter the totals for each type of transaction that occurred during the annual accounting period between the foreign corporation and the persons listed in columns (b) through (f). All amounts must be stated in U.S. dollars translated from functional currency at the average exchange rate for the foreign corporation's tax year. See instructions.

Enter the relevant functional currency and the exchange rate used throughout this schedule ▶

GBP

(a) Transactions of foreign corporation	(b) U.S. person filing this return	(c) Any domestic corporation or partnership controlled by U.S. person filing this return	(d) Any other foreign corporation or partnership controlled by U.S. person filing this return	(e) 10% or more U.S. shareholder of controlled foreign corporation (other than the U.S. person filing this return)	(f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation
1 Sales of stock in trade (inventory)					
2 Sales of tangible property other than stock in trade					
3 Sales of property rights (patents, trademarks, etc.).					
4 Platform contribution transaction payments received					
5 Cost sharing transaction payments received					
6 Compensation received for technical, managerial, engineering, construction, or like services . .	4,355,500.				
7 Commissions received					
8 Rents, royalties, and license fees received					
9 Hybrid dividends received (see instructions)					
10 Dividends received (exclude hybrid dividends, deemed distributions under subpart F, and distributions of previously taxed income)					
11 Interest received.					
12 Premiums received for insurance or reinsurance.					
13 Loan guarantee fees received .					
14 Other amounts received (attach statement)					
15 Add lines 1 through 14	4,355,500.				
16 Purchases of stock in trade (inventory)					
17 Purchases of tangible property other than stock in trade. . . .					
18 Purchases of property rights (patents, trademarks, etc.) . . .					
19 Platform contribution transaction payments paid					
20 Cost sharing transaction payments paid .					
21 Compensation paid for technical, managerial, engineering, construction, or like services . .					
22 Commissions paid					
23 Rents, royalties, and license fees paid					
24 Hybrid dividends paid (see instructions)					
25 Dividends paid (exclude hybrid dividends paid)					
26 Interest paid					
27 Premiums paid for insurance or reinsurance					
28 Loan guarantee fees paid . . .					
29 Other amounts paid (attach statement). .					
30 Add lines 16 through 29. . . .					

For Paperwork Reduction Act Notice, see the Instructions for Form 5471.

Schedule M (Form 5471) (Rev. 12-2021)

Schedule M (Form 5471) (Rev. 12-2021)

Page 2

Name of person filing Form 5471

Identifying number

(a) Transactions of foreign corporation	(b) U.S. person filing this return	(c) Any domestic corporation or partnership controlled by U.S. person filing this return	(d) Any other foreign corporation or partnership controlled by U.S. person filing this return	(e) 10% or more U.S. shareholder of controlled foreign corporation (other than the U.S. person filing this return)	(f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation
31 Accounts Payable	139,102.				
32 Amounts borrowed (enter the maximum loan balance during the year) - see instructions					
33 Accounts Receivable	288,200.				
34 Amounts loaned (enter the maximum loan balance during the year) - see instructions					

Schedule M (Form 5471) (Rev. 12-2021)

**SCHEDULE P
(Form 5471)**

(Rev. December 2020)

Department of the Treasury
Internal Revenue Service**Previously Taxed Earnings and Profits of U.S. Shareholder
of Certain Foreign Corporations**

▶ Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471

Global Benefits Group Inc

Name of U.S. shareholder

Global Benefits Group Inc

Name of foreign corporation

GLOBAL BENEFITS GROUP (UK) LIMITED

EIN (if any)

Identifying number

20-3842750

Identifying number

20-3842750

Reference ID number (see instructions)

00001

a Separate Category (Enter code - see instructions.)

▶ GEN

b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions)**Part I Previously Taxed E&P in Functional Currency** (see instructions)

		(a) Reclassified section 965(a) PTEP	(b) Reclassified section 965(b) PTEP	(c) General section 959(c)(1) PTEP
1a	Balance at beginning of year (see instructions)			
b	Beginning balance adjustments (attach statement)			
c	Adjusted beginning balance (combine lines 1a and 1b)			
2	Reduction for taxes unsuspended under anti-splitter rules			
3	Previously taxed E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation			
4	Previously taxed E&P carried over in nonrecognition transaction			
5	Other adjustments (attach statement)			
6	Total previously taxed E&P (combine lines 1c through 5)			
7	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P			
8	Actual distributions of previously taxed E&P			
9	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P			
10	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)			
11	Other adjustments (attach statement)			
12	Balance at beginning of next year (combine lines 6 through 11)			

For Paperwork Reduction Act Notice, see instructions.

Schedule P (Form 5471) (Rev. 12-2020)

Part I **Previously Taxed E&P in Functional Currency** (see instructions) *(continued)*

	(d) Reclassified section 951A PTEP	(e) Reclassified section 245A(d) PTEP	(f) Section 965(a) PTEP	(g) Section 965(b) PTEP	(h) Section 951A PTEP	(i) Section 245A(d) PTEP	(j) Section 951(a)(1)(A) PTEP	(k) Total
1a								
b								
c								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								

Part II Previously Taxed E&P in U.S. Dollars

		(a) Reclassified section 965(a) PTEP	(b) Reclassified section 965(b) PTEP	(c) General section 959(c)(1) PTEP
1 a	Balance at beginning of year (see instructions)			
b	Beginning balance adjustments (attach statement)			
c	Adjusted beginning balance (combine lines 1a and 1b)			
2	Reduction for taxes unsuspended under anti-splitter rules			
3	Previously taxed E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation			
4	Previously taxed E&P carried over in nonrecognition transaction			
5	Other adjustments (attach statement)			
6	Total previously taxed E&P (combine lines 1c through 5)			
7	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P			
8	Actual distributions of previously taxed E&P			
9	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P			
10	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)			
11	Other adjustments (attach statement)			
12	Balance at beginning of next year (combine lines 6 through 11)			

Schedule P (Form 5471) (Rev. 12-2020)

Part II Previously Taxed E&P in U.S. Dollars *(continued)*

	(d) Reclassified section 951A PTEP	(e) Reclassified section 245A(d) PTEP	(f) Section 965(a) PTEP	(g) Section 965(b) PTEP	(h) Section 951A PTEP	(i) Section 245A(d) PTEP	(j) Section 951(a)(1)(A) PTEP	(k) Total
1a								
b								
c								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								

Schedule P (Form 5471) (Rev. 12-2020)

**SCHEDULE Q
(Form 5471)**(Rev. December 2022)
Department of the Treasury
Internal Revenue Service**CFC Income by CFC Income Groups**

Attach to Form 5471.

Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

GLOBAL BENEFITS GROUP (UK) LIMITED

EIN (if any)

Reference ID number (see instructions)

00001

Complete a separate Schedule Q with respect to each applicable category of income (see instructions).

A Enter separate category code with respect to which this Schedule Q is being completed (see instructions for codes) GEN**B** If category code "PAS" is entered on line A, enter the applicable grouping code (see instructions)**C** If code "901j" is entered on line A, enter the country code for the sanctioned country (see instructions)

Complete a separate Schedule Q for U.S. source income and foreign source income (see instructions for an exception).

D Indicate whether this Schedule Q is being completed for: ☐ U.S. source income or ☒ Foreign source income

Complete a separate Schedule Q for FOGEI or FORI income.

E If this Schedule Q is being completed for FOGEI or FORI income, check this box ☐Enter amounts in functional currency
of the foreign corporation (unless
otherwise noted).

	(i) Country Code	(ii) Gross Income	(iii) Definitely Related Expenses	(iv) Related Person Interest Expense	(v) Other Interest Expense	(vi) Research & Experimental Expenses	(vii) Other Expenses (attach schedule)
1 Subpart F Income Groups							
a Dividends, Interest, Rents, Royalties, & Annuities (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
b Net Gain From Certain Property Transactions (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
c Net Gain From Commodities Transactions (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
d Net Foreign Currency Gain (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
e Income Equivalent to Interest (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
f Other							
(1) Unit name: _____							
(2) Unit name: _____							
g Foreign Base Company Sales Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							

Important: See **Computer-Generated Schedule Q** in instructions.

For Paperwork Reduction Act Notice, see instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

JSA

2X1650 3.000

0001W4 X45R

Schedule Q (Form 5471) (Rev. 12-2022)

Page **2**

	(viii) Current Year Tax on Reattributed Income From Disregarded Payments	(ix) Current Year Tax on All Other Disregarded Payments	(x) Other Current Year Taxes	(xi) Net Income (column (ii) less columns (iii) through (x))	(xii) Foreign Taxes for Which Credit Allowed (U.S. Dollars)	(xiii) Average Asset Value	(xiv) High Tax Election	(xv) Loss Allocation	(xvi) Net Income After Loss Allocation (column (xi) minus column (xv))
1									
a									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
b									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
c									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
d									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
e									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
f									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
g									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		

Important: See **Computer-Generated Schedule Q** in instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

Schedule Q (Form 5471) (Rev. 12-2022)

Page **3**

Enter amounts in functional currency of the foreign corporation (unless otherwise noted).

	(i) Country Code	(ii) Gross Income	(iii) Definitely Related Expenses	(iv) Related Person Interest Expense	(v) Other Interest Expense	(vi) Research & Experimental Expenses	(vii) Other Expenses (attach schedule)
1 Subpart F Income Groups							
h Foreign Base Company Services Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
i Full Inclusion Foreign Base Company Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
j Insurance Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
k International Boycott Income							
l Bribes, Kickbacks, and Other Payments							
m Section 901(j) income							
2 Recaptured Subpart F Income							
3 Tested Income Group (Total)		3,400,993.					3,727,496.
(1) Unit name: Tested Income	UK	3,400,993.					3,727,496.
(2) Unit name: _____							
4 Residual Income Group (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
5 Total		3,400,993.					3,727,496.

Important: See **Computer-Generated Schedule Q** in instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

Schedule Q (Form 5471) (Rev. 12-2022)

Page **4**

	(viii) Current Year Tax on Reattributed Income From Disregarded Payments	(ix) Current Year Tax on All Other Disregarded Payments	(x) Other Current Year Taxes	(xi) Net Income (column (ii) less columns (iii) through (x))	(xii) Foreign Taxes for Which Credit Allowed (U.S. Dollars)	(xiii) Average Asset Value	(xiv) High Tax Election	(xv) Loss Allocation	(xvi) Net Income After Loss Allocation (column (xi) minus column (xv))
1									
h									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
i									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
j									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
k									
l									
m									
2									
3				-326,503.					-326,503.
(1)				-326,503.			<input type="checkbox"/>		-326,503.
(2)							<input type="checkbox"/>		
4									
(1)									
(2)									
5				-326,503.					-326,503.

Important: See **Computer-Generated Schedule Q** in instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

**SCHEDULE R
(Form 5471)**

(December 2020)
Department of the Treasury
Internal Revenue Service

Distributions From a Foreign Corporation

► Attach to Form 5471.

OMB No. 1545-0123

► Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471		Identifying number
Global Benefits Group Inc		20-3842750
Name of foreign corporation	EIN (if any)	Reference ID number (see instructions)
GLOBAL BENEFITS GROUP (UK) LIMITED		00001

	(a) Description of distribution	(b) Date of distribution	(c) Amount of distribution in foreign corporation's functional currency	(d) Amount of E&P distribution in foreign corporation's functional currency
1	No Distributions	12/31/2022	NONE	NONE
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				

Form **5471**

(Rev. December 2022)

Department of the Treasury
Internal Revenue Service**Information Return of U.S. Persons With Respect
to Certain Foreign Corporations**Go to www.irs.gov/Form5471 for instructions and the latest information.Information furnished for the foreign corporation's annual accounting period (tax year required by
section 898) (see instructions) beginning 01/01/2022 , and ending 12/31/2022

OMB No. 1545-0123

Attachment
Sequence No. **121**

Name of person filing this return

Global Benefits Group Inc

Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address)

27051 Towne Centre Drive, #210

City or town, state, and ZIP code

FOOTHILL RANCH, CA 92610

Filer's tax year beginning 01/01/2022 , and ending 12/31/2022

D Check box if this is a final Form 5471 for the foreign corporation ☐**E** Check if any excepted specified foreign financial assets are reported on this form (see instructions). ☐**F** Check the box if this Form 5471 has been completed using "Alternative Information" under Rev. Proc. 2019-40 ☐**G** If the box on line F is checked, enter the corresponding code for "Alternative Information" (see instructions)**H** Person(s) on whose behalf this information return is filed:

(1) Name	(2) Address	(3) Identifying number	(4) Check applicable box(es)		
			Shareholder	Officer	Director
GLOBAL BENEFITS GROUP, INC	27422 PORTOLA PARKWAY STE 110, FOOTHILL RANCH C	20-3842750	X		

Important: Fill in all applicable lines and schedules. All information **must** be in English. All amounts **must** be stated in U.S. dollars unless otherwise indicated.

1a Name and address of foreign corporation				b(1) Employer identification number, if any	
GBG ELITE MEDICAL SERVICES, S.A. DE C.V. (MEXICO)					
Bosque de Ciruelos 180 PP 101 Bosques de las Lomas				b(2) Reference ID number (see instructions)	
Miguel Hidalgo, Mexico City 11700 MX				00002	
				c Country under whose laws incorporated	
				MX	
d Date of incorporation	e Principal place of business	f Principal business activity code number	g Principal business activity	h Functional currency code	
01/18/2018	MX	524210	Brokering & Management	MXN	

2 Provide the following information for the foreign corporation's accounting period stated above.

a Name, address, and identifying number of branch office or agent (if any) in the United States	b If a U.S. income tax return was filed, enter:	
	(i) Taxable income or (loss)	(ii) U.S. income tax paid (after all credits)
c Name and address of foreign corporation's statutory or resident agent in country of incorporation	d Name and address (including corporate department, if applicable) of person (or persons) with custody of the books and records of the foreign corporation, and the location of such books and records, if different	

Schedule A Stock of the Foreign Corporation

(a) Description of each class of stock	(b) Number of shares issued and outstanding	
	(i) Beginning of annual accounting period	(ii) End of annual accounting period
COMMON	200,000.	200,000.

For Paperwork Reduction Act Notice, see instructions.

Form **5471** (Rev. 12-2022)

Schedule C Income Statement (see instructions)

Important: Report all information in functional currency in accordance with U.S. generally accepted accounting principles (GAAP). Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules). However, if the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for dollar approximate separate transactions method (DASTM) corporations.

			Functional Currency	U.S. Dollars
Income	1a Gross receipts or sales	1a	16,380,570.	820,263.
	b Returns and allowances	1b		
	c Subtract line 1b from line 1a	1c	16,380,570.	820,263.
	2 Cost of goods sold	2		
	3 Gross profit (subtract line 2 from line 1c)	3	16,380,570.	820,263.
	4 Dividends	4		
	5 Interest	5		
	6a Gross rents	6a		
	b Gross royalties and license fees	6b		
	7 Net gain or (loss) on sale of capital assets	7		
Deductions	8a Foreign currency transaction gain or loss - unrealized	8a		
	b Foreign currency transaction gain or loss - realized	8b	1,754,182.	87,841.
	9 Other income (attach statement)	9		
	10 Total income (add lines 3 through 9)	10	18,134,752.	908,104.
	11 Compensation not deducted elsewhere	11		
	12a Rents	12a		
	b Royalties and license fees	12b		
	13 Interest	13		
	14 Depreciation not deducted elsewhere	14		
	15 Depletion	15		
Net Income	16 Taxes (exclude income tax expense (benefit)) Stmt. 47	16	654,868.	32,793.
	17 Other deductions (attach statement - exclude income tax expense (benefit)) See Statement. 47	17	10,618,628.	531,732.
	18 Total deductions (add lines 11 through 17)	18	11,273,496.	564,525.
	19 Net income or (loss) before unusual or infrequently occurring items, and income tax expense (benefit) (subtract line 18 from line 10) . .	19	6,861,256.	343,580.
Other Comprehensive Income	20 Unusual or infrequently occurring items	20		
	21a Income tax expense (benefit) - current . See Statement. 47	21a	3,573,767.	178,958.
	b Income tax expense (benefit) - deferred	21b		
	22 Current year net income or (loss) per books (combine lines 19 through 21b) .	22	3,287,489.	164,622.
Other Comprehensive Income	23a Foreign currency translation adjustments	23a		
	b Other	23b		
	c Income tax expense (benefit) related to other comprehensive income	23c		
	24 Other comprehensive income (loss), net of tax (line 23a plus line 23b less line 23c)	24		

Schedule F Balance Sheet**Important:** Report all amounts in U.S. dollars prepared and translated in accordance with U.S. GAAP. See instructions for an exception for DASTM corporations.

Assets		(a) Beginning of annual accounting period	(b) End of annual accounting period
1 Cash	1	1,788,123.	1,314,359.
2a Trade notes and accounts receivable	2a	NONE	1,829,213.
b Less allowance for bad debts	2b	()	()
3 Derivatives	3		
4 Inventories	4		
5 Other current assets (attach statement).	5		
6 Loans to shareholders and other related persons	6		
7 Investment in subsidiaries (attach statement).	7		
8 Other investments (attach statement)	8		
9a Buildings and other depreciable assets	9a		
b Less accumulated depreciation.	9b	()	()
10a Depletable assets	10a		
b Less accumulated depletion	10b	()	()
11 Land (net of any amortization)	11		
12 Intangible assets:			
a Goodwill	12a		
b Organization costs.	12b		
c Patents, trademarks, and other intangible assets	12c		
d Less accumulated amortization for lines 12a, 12b, and 12c	12d	()	()
13 Other assets (attach statement) See Statement 48.	13	7,462,286.	-2,934,046.
14 Total assets	14	9,250,409.	209,526.
Liabilities and Shareholders' Equity			
15 Accounts payable	15		
16 Other current liabilities (attach statement) See Statement 48.	16	9,914,589.	709,083.
17 Derivatives	17		
18 Loans from shareholders and other related persons	18		
19 Other liabilities (attach statement)	19		
20 Capital stock:			
a Preferred stock	20a		
b Common stock	20b		
21 Paid-in or capital surplus (attach reconciliation)	21		
22 Retained earnings	22	-664,180.	-499,557.
23 Less cost of treasury stock	23	()	()
24 Total liabilities and shareholders' equity	24	9,250,409.	209,526.

Schedule G Other Information

	Yes	No
1 During the tax year, did the foreign corporation own at least a 10% interest, directly or indirectly, in any foreign partnership? If "Yes," see the instructions for required statement.		X
2 During the tax year, did the foreign corporation own an interest in any trust?		X
3 During the tax year, did the foreign corporation own any foreign entities that were disregarded as separate from their owner under Regulations sections 301.7701-2 and 301.7701-3 or did the foreign corporation own any foreign branches (see instructions)? If "Yes," you are generally required to attach Form 8858 for each entity or branch (see instructions).		X
4a During the tax year, did the filer pay or accrue any base erosion payment under section 59A(d) to the foreign corporation or did the filer have a base erosion tax benefit under section 59A(c)(2) with respect to a base erosion payment made or accrued to the foreign corporation (see instructions)? If "Yes," complete lines 4b and 4c.		X
b Enter the total amount of the base erosion payments. \$ _____		
c Enter the total amount of the base erosion tax benefit \$ _____		
5a During the tax year, did the foreign corporation pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? If "Yes," complete line 5b.		X
b Enter the total amount of the disallowed deductions (see instructions) \$ _____		

Schedule G Other Information (continued)

	Yes	No
6a Is the filer claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any transactions with the foreign corporation? If "Yes," complete lines 6b, 6c, and 6d. See instructions.		X
b Enter the amount of gross receipts derived from all sales of general property to the foreign corporation that the filer included in its computation of foreign-derived deduction eligible income (FDDEI) \$ _____		
c Enter the amount of gross income derived from a license of property to the foreign corporation that the filer included in its computation of FDDEI (see instructions) \$ _____		
d Enter the amount of gross income derived from services provided to the foreign corporation that the filer included in its computation of FDDEI (see instructions) \$ _____		
7 During the tax year, was the foreign corporation a participant in any cost sharing arrangement? If the answer to question 7 is "Yes," complete a separate Schedule G-1 for each cost sharing arrangement in which the foreign corporation was a participant during the tax year.		X
8 From April 25, 2014, to December 31, 2017, did the foreign corporation purchase stock or securities of a shareholder of the foreign corporation for use in a triangular reorganization (within the meaning of Regulations section 1.358-6(b)(2))?		X
9a Did the foreign corporation receive any intangible property in a prior year or the current tax year for which the U.S. transferor is required to report a section 367(d) annual income inclusion for the taxable year? If "Yes," go to line 9b.		X
b Enter in functional currency the amount of the earnings and profits reduction pursuant to section 367(d)(2)(B) for the tax year \$ _____		
10 During the tax year, was the foreign corporation an expatriated foreign subsidiary under Regulations section 1.7874-12(a)(9)? If "Yes," see instructions and attach statement.		X
11 During the tax year, did the foreign corporation participate in any reportable transaction as defined in Regulations section 1.6011-4? If "Yes," attach Form(s) 8886 if required by Regulations section 1.6011-4(c)(3)(i)(G).		X
12 During the tax year, did the foreign corporation pay or accrue any foreign tax that was disqualified for credit under section 901(m)?		X
13 During the tax year, did the foreign corporation pay or accrue foreign taxes to which section 909 applies, or treat foreign taxes that were previously suspended under section 909 as no longer suspended?		X
14 Did you answer "Yes" to any of the questions in the instructions for line 14? If "Yes," enter the corresponding code(s) from the instructions and attach statement _____		X
15 Does the foreign corporation have interest expense disallowed under section 163(j) (see instructions)? If "Yes," enter the amount \$ _____		X
16 Does the foreign corporation have previously disallowed interest expense under section 163(j) carried forward to the current tax year (see instructions)? If "Yes," enter the amount \$ _____		X
17a Did any extraordinary reduction with respect to a controlling section 245A shareholder occur during the tax year (see instructions)?		X
b If the answer to question 17a is "Yes," was an election made to close the tax year such that no amount is treated as an extraordinary reduction amount or tiered extraordinary reduction amount (see instructions)?		
18 Does the reporting corporation have any loan to or from the related party to which the safe-haven rate rules of Regulations section 1.482-2(a)(2)(iii)(B) are applicable, and for which the reporting corporation used a rate of interest within the safe-haven range of Regulations section 1.482-2(a)(2)(iii)(B)(1) (100% to 130% of the AFR for the relevant term)?		X
19a Did the reporting corporation make at least one distribution or acquisition (as defined by Regulations section 1.385-3) during the period including the tax year and the preceding 3 tax years, or, during the period beginning 36 months before the date of the respective distribution or acquisition and ending 36 months afterward, did the reporting corporation issue or refinance indebtedness owed to a related party?		X
b If the answer to question 19a is "Yes," provide the following. (1) The amount of such distribution(s) and acquisition(s) \$ _____ (2) The amount of such related party indebtedness \$ _____		

Schedule I Summary of Shareholder's Income From Foreign Corporation (see instructions)

If item H on page 1 is completed, a separate Schedule I must be filed for each Category 4, 5a, or 5b filer for whom reporting is furnished on this Form 5471. This Schedule I is being completed for:

Name of U.S. shareholder Global Benefits Group Inc

Identifying number 20-3842750

1a	Section 964(e)(4) subpart F dividend income from the sale of stock of a lower-tier foreign corporation (see instructions)	1a	
b	Section 245A(e)(2) subpart F income from hybrid dividends of tiered corporations (see instructions) . . .	1b	
c	Subpart F income from tiered extraordinary disposition amounts not eligible for subpart F exception under section 954(c)(6)	1c	
d	Subpart F income from tiered extraordinary reduction amounts not eligible for subpart F exception under section 954(c)(6)	1d	
e	Section 954(c) Subpart F Foreign Personal Holding Company Income (enter result from Worksheet A) . .	1e	
f	Section 954(d) Subpart F Foreign Base Company Sales Income (enter result from Worksheet A)	1f	
g	Section 954(e) Subpart F Foreign Base Company Services Income (enter result from Worksheet A) . . .	1g	
h	Other subpart F income (enter result from Worksheet A)	1h	
2	Earnings invested in U.S. property (enter the result from Worksheet B)	2	
3	Reserved for future use	3	
4	Factoring income See instructions for reporting amounts on lines 1, 2, and 4 on your income tax return.	4	
5a	Section 245A eligible dividends (see instructions)	5a	
b	Extraordinary disposition amounts (see instructions)	5b	
c	Extraordinary reduction amounts (see instructions)	5c	
d	Section 245A(e) dividends (see instructions)	5d	
e	Dividends not reported on line 5a, 5b, 5c, or 5d	5e	
6	Exchange gain or (loss) on a distribution of previously taxed earnings and profits	6	

	Yes	No
7a Was any income of the foreign corporation blocked?		
b Did any such income become unblocked during the tax year (see section 964(b))?		
If the answer to either question is "Yes," attach an explanation.		
8a Did this U.S. shareholder have an extraordinary disposition (ED) account with respect to the foreign corporation at any time during the tax year (see instructions)?		
b If the answer to question 8a is "Yes," enter the U.S. shareholder's ED account balance at the beginning of the CFC year \$ _____ and at the end of the tax year \$ _____. Provide an attachment detailing any changes from the beginning to the ending balances.		
c Enter the CFC's aggregate ED account balance with respect to all U.S. shareholders at the beginning of the CFC year \$ _____ and at the end of the tax year \$ _____. Provide an attachment detailing any changes from the beginning to the ending balances.		
9 Enter the sum of the hybrid deduction accounts with respect to stock of the foreign corporation (see instructions) \$ _____		

Form **5471** (Rev. 12-2022)

**SCHEDULE E
(Form 5471)**

(Rev. December 2021)

Department of the Treasury
Internal Revenue Service**Income, War Profits, and Excess Profits Taxes Paid or Accrued**

▶ Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471

Global Benefits Group Inc

Name of foreign corporation

GBG ELITE MEDICAL SERVICES, S.A. DE C.V. (MEX)

Identifying number

20-3842750

Reference ID number (see instructions)

00002

a Separate Category (Enter code - see instructions.) ▶ GEN

b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions). ▶

c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶

Part I Taxes for Which a Foreign Tax Credit Is Allowed**Section 1 - Taxes Paid or Accrued Directly by Foreign Corporation**

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Unsuspended Taxes	(d) Country or U.S. Possession to Which Tax Is Paid (Enter code - see instructions. Use a separate line for each.)	(e) Foreign Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)	(f) U.S. Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)
1	GBG Elite Medical Services, S.A. DE C.V. (Mex)	00002		MX	2022/01/01	2022/12/31
2						
3						
4						

	(g) Income Subject to Tax in the Foreign Jurisdiction (see instructions)	(h) If taxes are paid on U.S. source income, check box	(i) Local Currency in Which Tax Is Payable (enter code - see instructions)	(j) Tax Paid or Accrued (in local currency in which the tax is payable)	(k) Conversion Rate to U.S. Dollars	(l) In U.S. Dollars (divide column (j) by column (k))	(m) In Functional Currency of Foreign Corporation
1	343,581.		MXN	3,573,767.	19.9698500	178,958.	3,573,767.
2							
3							
4							
5	Total (combine lines 1 through 4 of column (l)). Also report amount on Schedule E-1, line 4 ▶					178,958.	
6	Total (combine lines 1 through 4 of column (m)) ▶						3,573,767.

Section 2 - Taxes Deemed Paid by Foreign Corporation

	(a) Name of Lower-Tier Distributing Foreign Corporation	(b) EIN or Reference ID Number of Lower-Tier Distributing Foreign Corporation	(c) Country or U.S. Possession to Which Tax Is Paid (Enter code - see instructions. Use a separate line for each.)	(d) PTEP Group (enter code)	(e) Annual PTEP Account (enter year)
1					
2					
3					
4					

	(f) PTEP Distributed (enter amount in functional currency)	(g) Total Amount of PTEP in the PTEP Group (in functional currency)	(h) Total Amount of the PTEP Group Taxes With Respect to PTEP Group (USD)	(i) Foreign Income Taxes Properly Attributable to PTEP and not Previously Deemed Paid ((column (f)/column (g)) x column (h)) (USD)
1				
2				
3				
4				
5	Total (combine lines 1 through 4 of column (i)). Also report amount on Schedule E-1, line 6 ▶			

For Paperwork Reduction Act Notice, see instructions.

Schedule E (Form 5471) (Rev. 12-2021)

JSA

2X1666 2.000

0001W4 X45R

Name of foreign corporation GBG ELITE MEDICAL SERVICES, S.A. DE C.V. (MEX)	EIN (if any)	Reference ID number (see instructions) 00002
a Separate Category (Enter code-see instructions.)		▶ GEN
b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions)		▶
c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions)		▶

Part II Election

For tax years beginning after December 31, 2004, has an election been made under section 986(a)(1)(D) to translate taxes using the exchange rate on the date of payment?

☐ Yes ☒ No If "Yes," state date of election ▶
Part III Taxes for Which a Foreign Tax Credit Is Disallowed (Enter in functional currency of foreign corporation.)

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Section 901(j)	(d) Section 901(k) and (l)	(e) Section 901(m)	(f) U.S. Taxes	(g) Suspended Taxes	(h) Other	(i) Total
1									
2									
3	In functional currency (combine lines 1 and 2)								▶
4	In U.S. dollars (translated at the average exchange rate, as defined in section 989(b)(3) and related regulations (see instructions)).								▶

Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Earnings and Profits (E&P) of Foreign Corporation

IMPORTANT: Enter amounts in U.S. dollars.		Taxes related to:			
		(a) Subpart F Income	(b) Tested Income	(c) Residual Income	(d) Suspended Taxes
1a	Balance at beginning of year (as reported in prior year Schedule E-1)	-0-	-0-	-0-	
b	Beginning balance adjustments (attach statement)				
c	Adjusted beginning balance (combine lines 1a and 1b)				
2	Adjustment for foreign tax redetermination.				
3a	Taxes unsuspended under anti-splitter rules				
b	Taxes suspended under anti-splitter rules.				
4	Taxes reported on Schedule E, Part I, Section 1, line 5, column (l)		178,958.		
5	Taxes carried over in nonrecognition transactions				
6	Taxes reported on Schedule E, Part I, Section 2, line 5, column (i).				
7	Other adjustments (attach statement).				
8	Taxes paid or accrued on current income/E&P or accumulated E&P (combine lines 1c through 7)		178,958.		
9	Taxes deemed paid with respect to inclusions (see instructions)				
10	Taxes deemed paid with respect to actual distributions				
11	Taxes on amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P				
12	Other (attach statement).				
13	Balance of taxes paid or accrued (combine lines 8 through 12 in columns (a), (b), and (c))		178,958.		
14	Reserved for future use				
15	Reduction for other taxes not deemed paid.				
16	Balance of taxes paid or accrued at the beginning of the next year. Line 16, columns (a), (b), and (c) must always equal zero. So, if necessary, enter negative amounts on line 15 of columns (a), (b), and (c) in amounts sufficient to reduce line 13, columns (a), (b), and (c) to zero. For the remaining columns, combine lines 8 through 12	-0-	-0-	-0-	

Schedule E (Form 5471) (Rev. 12-2021)

Page 3

Name of foreign corporation	EIN (if any)	Reference ID number (see instructions)
GBG ELITE MEDICAL SERVICES, S.A. DE C.V. (MEX		00002

- a Separate Category (Enter code - see instructions.) ▶ GEN
- b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶
- c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶

Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Accumulated Earnings and Profits (E&P) of Foreign Corporation (continued)

(e) Taxes related to previously taxed E&P (see instructions)

	(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP
1a										
b										
c										
2										
3a										
b										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										

Schedule E (Form 5471) (Rev. 12-2021)

Document Page 199 of 322
Current Earnings and Profits**SCHEDULE H**
(Form 5471)(Rev. December 2021)
Department of the Treasury
Internal Revenue Service

▶ Attach to Form 5471.

OMB No. 1545-0123

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471 Global Benefits Group Inc		Identifying number 20-3842750
Name of foreign corporation GBG ELITE MEDICAL SERVICES, S.A. DE C.V. (MEX)	EIN (if any)	Reference ID number (see instructions) 00002

IMPORTANT: Enter the amounts on lines 1 through 5c in **functional** currency.

1	Current year net income or (loss) per foreign books of account.		1	3,287,489.
2	Net adjustments made to line 1 to determine current earnings and profits according to U.S. financial and tax accounting standards (see instructions):	Net Additions	Net Subtractions	
a	Capital gains or losses.	2a		
b	Depreciation and amortization.	2b		
c	Depletion.	2c		
d	Investment or incentive allowance.	2d		
e	Charges to statutory reserves.	2e		
f	Inventory adjustments.	2f		
g	Income taxes (see Schedule E, Part I, Section 1, line 6, column (m), and Part III, line 3, column (i)).	2g	3,573,767.	
h	Foreign currency gains or losses.	2h		
i	Other (attach statement).	2i		
3	Total net additions.	3	3,573,767.	
4	Total net subtractions.	4		
5a	Current earnings and profits (line 1 plus line 3 minus line 4).	5a		6,861,256.
b	DASTM gain or (loss) for foreign corporations that use DASTM (see instructions).	5b		
c	Combine lines 5a and 5b and enter the result on line 5c. Then enter on lines 5c(i), 5c(ii), and 5c(iii)(A) through 5c(iii)(D) the portion of the line 5c amount with respect to the categories of income shown on those lines.	5c		6,861,256.
	(i) General category (enter amount on applicable Schedule J, Part I, line 3, column (a)).	5c(i)		
	(ii) Passive category (enter amount on applicable Schedule J, Part I, line 3, column (a)).	5c(ii)		
	(iii) Section 901(j) category:			
	(A) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(A) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(A)		
	(B) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(B) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(B)		
	(C) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(C) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(C)		
	(D) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(D) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(D)		
d	Current earnings and profits in U.S. dollars (line 5c translated at the average exchange rate, as defined in section 989(b)(3) and the related regulations (see instructions)).	5d		352,279.
e	Enter exchange rate used for line 5d. ▶		19.4767890	

For Paperwork Reduction Act Notice, see instructions.

Schedule H (Form 5471) (Rev. 12-2021)

**SCHEDULE I-1
(Form 5471)**

(Rev. December 2021)

Department of the Treasury
Internal Revenue Service

Information for Global Intangible Low-Taxed Income

► Attach to Form 5471.

► Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471 Global Benefits Group Inc		Identifying number 20-3842750
Name of foreign corporation GBG ELITE MEDICAL SERVICES, S.A. DE C.V. (MEX	EIN (if any)	Reference ID number (see instructions) 00002
Separate Category (Enter code - see instructions.) ► GEN		

		Functional Currency	Conversion Rate	U.S. Dollars
1 Gross income (see instructions if cost of goods sold exceed gross receipts)	1	18,134,752.		
2 Exclusions (see instructions if cost of goods sold exceed gross receipts)				
a Effectively connected income 2a				
b Subpart F income 2b				
c High-tax exception income per section 954(b)(4) 2c				
d Related party dividends 2d				
e Foreign oil and gas extraction income 2e				
3 Total exclusions (combine lines 2a through 2e)	3			
4 Gross income less total exclusions (line 1 minus line 3) (see instructions)	4	18,134,752.		
5 Deductions properly allocable to amount on line 4	5	14,847,263.		
6 Tested income (loss) (line 4 minus line 5) (see instructions)	6	3,287,489.	19.9698500	164,623.
7 Tested foreign income taxes	7		19.9698500	
8 Qualified business asset investment (QBAI)	8		19.9698500	
9a Interest expense included on line 5 9a				
b Qualified interest expense 9b				
c Tested loss QBAI amount 9c				
d Tested interest expense (line 9a minus the sum of line 9b and line 9c). If zero or less, enter -0-	9d		19.9698500	
10a Interest income included in line 4 10a				
b Qualified interest income 10b				
c Tested interest income (line 10a minus line 10b). If zero or less, enter -0-	10c		19.9698500	

For Paperwork Reduction Act Notice, see instructions.

Schedule I-1 (Form 5471) (Rev. 12-2021)

**SCHEDULE J
(Form 5471)**(Rev. December 2020)
Department of the Treasury
Internal Revenue Service**Accumulated Earnings & Profits (E&P) of Controlled Foreign Corporation**► **Attach to Form 5471.**

OMB No. 1545-0123

► **Go to www.irs.gov/Form5471 for instructions and the latest information.**

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

GBG ELITE MEDICAL SERVICES, S.A. DE C.V. (MEX

EIN (if any)

Reference ID number (see instructions)

00002

a Separate Category (Enter code - see instructions.) ► GEN**b** If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ►**Part I Accumulated E&P of Controlled Foreign Corporation**☐ Check the box if person filing return does not have all U.S. shareholders' information to complete an amount in column (e) (see instructions).**Important:** Enter amounts in functional currency.

		(a) Post-2017 E&P Not Previously Taxed (post-2017 section 959(c)(3) balance)	(b) Post-1986 Undistributed Earnings (post-1986 and pre-2018 section 959(c)(3) balance)	(c) Pre-1987 E&P Not Previously Taxed (pre-1987 section 959(c)(3) balance)	(d) Hovering Deficit and Deduction for Suspended Taxes	(e) Previously Taxed E&P (see instructions)	
						(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP
1a	Balance at beginning of year (as reported on prior year Schedule J)	-7,024,322.					
b	Beginning balance adjustments (attach statement)						
c	Adjusted beginning balance (combine lines 1a and 1b)	-7,024,322.					
2a	Reduction for taxes unsuspended under anti-splitter rules						
b	Disallowed deduction for taxes suspended under anti-splitter rules						
3	Current year E&P (or deficit in E&P) (enter amount from applicable line 5c of Schedule H)	6,861,256.					
4	E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation						
5a	E&P carried over in nonrecognition transaction						
b	Reclassify deficit in E&P as hovering deficit after nonrecognition transaction						
6	Other adjustments (attach statement)						
7	Total current and accumulated E&P (combine lines 1c through 6)	-163,066.					
8	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P						
9	Actual distributions						
10	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P						
11	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)						
12	Other adjustments (attach statement)						
13	Hovering deficit offset of undistributed post- transaction E&P (see instructions)						
14	Balance at beginning of next year (combine lines 7 through 13)	-163,066.					

For Paperwork Reduction Act Notice, see the Instructions for Form 5471.**Schedule J (Form 5471) (Rev. 12-2020)**

JSA

2X1665 2.000

0001W4 X45R

Part I Accumulated E&P of Controlled Foreign Corporation (continued)					
	(e) Previously Taxed E&P (see instructions)				
	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP
1 a					
b					
c					
2 a					
b					
3					
4					
5 a					
b					
6					
7					
8					
9					
10					
11					
12					
13					
14					
	(e) Previously Taxed E&P (see instructions)			(f)	
	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP	Total Section 964(a) E&P (combine columns (a), (b), (c), and (e)(i) through (e)(x))	
1 a				-7,024,322.	
b					
c				-7,024,322.	
2 a					
b					
3				6,861,256.	
4					
5 a					
b					
6					
7				-163,066.	
8					
9					
10					
11					
12					
13					
14				-163,066.	

Part II **Nonpreviously Taxed E&P Subject to Recapture as Subpart F Income (section 952(c)(2))**

Important: Enter amounts in functional currency.

1	Balance at beginning of year	▶	1	
2	Additions (amounts subject to future recapture).	▶	2	
3	Subtractions (amounts recaptured in current year)	▶	3	
4	Balance at end of year (combine lines 1 through 3)	▶	4	

Schedule J (Form 5471) (Rev. 12-2020)

SCHEDULE M
(Form 5471)(Rev. December 2021)
Department of the Treasury
Internal Revenue Service**Transactions Between Controlled Foreign Corporation
and Shareholders or Other Related Persons**

OMB No. 1545-0123

▶ Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471

Identifying number

Global Benefits Group Inc

20-3842750

Name of foreign corporation

EIN (if any)

Reference ID number (see instructions)

GBG ELITE MEDICAL SERVICES, S.A. DE C.V. (MEX)

00002

Important: Complete a **separate** Schedule M for each controlled foreign corporation. Enter the totals for each type of transaction that occurred during the annual accounting period between the foreign corporation and the persons listed in columns (b) through (f). All amounts must be stated in U.S. dollars translated from functional currency at the average exchange rate for the foreign corporation's tax year. See instructions.

Enter the relevant functional currency and the exchange rate used throughout this schedule ▶

PESO

(a) Transactions of foreign corporation	(b) U.S. person filing this return	(c) Any domestic corporation or partnership controlled by U.S. person filing this return	(d) Any other foreign corporation or partnership controlled by U.S. person filing this return	(e) 10% or more U.S. shareholder of controlled foreign corporation (other than the U.S. person filing this return)	(f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation
1 Sales of stock in trade (inventory)					
2 Sales of tangible property other than stock in trade					
3 Sales of property rights (patents, trademarks, etc.).					
4 Platform contribution transaction payments received					
5 Cost sharing transaction payments received					
6 Compensation received for technical, managerial, engineering, construction, or like services . .					
7 Commissions received	-820,265.				
8 Rents, royalties, and license fees received					
9 Hybrid dividends received (see instructions)					
10 Dividends received (exclude hybrid dividends, deemed distributions under subpart F, and distributions of previously taxed income)					
11 Interest received.					
12 Premiums received for insurance or reinsurance.					
13 Loan guarantee fees received .					
14 Other amounts received (attach statement)					
15 Add lines 1 through 14	-820,265.				
16 Purchases of stock in trade (inventory)					
17 Purchases of tangible property other than stock in trade. . . .					
18 Purchases of property rights (patents, trademarks, etc.) . . .					
19 Platform contribution transaction payments paid					
20 Cost sharing transaction payments paid .					
21 Compensation paid for technical, managerial, engineering, construction, or like services . .					
22 Commissions paid					
23 Rents, royalties, and license fees paid					
24 Hybrid dividends paid (see instructions)					
25 Dividends paid (exclude hybrid dividends paid)					
26 Interest paid					
27 Premiums paid for insurance or reinsurance					
28 Loan guarantee fees paid . . .					
29 Other amounts paid (attach statement). .					
30 Add lines 16 through 29. . . .					

For Paperwork Reduction Act Notice, see the Instructions for Form 5471.

Schedule M (Form 5471) (Rev. 12-2021)

Schedule M (Form 5471) (Rev. 12-2021)

Page 2

Name of person filing Form 5471

Identifying number

(a) Transactions of foreign corporation	(b) U.S. person filing this return	(c) Any domestic corporation or partnership controlled by U.S. person filing this return	(d) Any other foreign corporation or partnership controlled by U.S. person filing this return	(e) 10% or more U.S. shareholder of controlled foreign corporation (other than the U.S. person filing this return)	(f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation
31 Accounts Payable					
32 Amounts borrowed (enter the maximum loan balance during the year) - see instructions					
33 Accounts Receivable			273,741.		
34 Amounts loaned (enter the maximum loan balance during the year) - see instructions					

Schedule M (Form 5471) (Rev. 12-2021)

**SCHEDULE P
(Form 5471)**

(Rev. December 2020)

Department of the Treasury
Internal Revenue Service**Previously Taxed Earnings and Profits of U.S. Shareholder
of Certain Foreign Corporations**

▶ Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471

Global Benefits Group Inc

Name of U.S. shareholder

Global Benefits Group Inc

Name of foreign corporation

GBG ELITE MEDICAL SERVICES, S.A. DE C.V. (MEX

EIN (if any)

Identifying number

20-3842750

Identifying number

20-3842750

Reference ID number (see instructions)

00002

a Separate Category (Enter code - see instructions.) ▶

GEN

b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶**Part I Previously Taxed E&P in Functional Currency** (see instructions)

		(a) Reclassified section 965(a) PTEP	(b) Reclassified section 965(b) PTEP	(c) General section 959(c)(1) PTEP
1a	Balance at beginning of year (see instructions)			
b	Beginning balance adjustments (attach statement)			
c	Adjusted beginning balance (combine lines 1a and 1b)			
2	Reduction for taxes unsuspended under anti-splitter rules			
3	Previously taxed E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation			
4	Previously taxed E&P carried over in nonrecognition transaction			
5	Other adjustments (attach statement)			
6	Total previously taxed E&P (combine lines 1c through 5)			
7	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P			
8	Actual distributions of previously taxed E&P			
9	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P			
10	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)			
11	Other adjustments (attach statement)			
12	Balance at beginning of next year (combine lines 6 through 11)			

For Paperwork Reduction Act Notice, see instructions.

Schedule P (Form 5471) (Rev. 12-2020)

Part I **Previously Taxed E&P in Functional Currency** (see instructions) *(continued)*

	(d) Reclassified section 951A PTEP	(e) Reclassified section 245A(d) PTEP	(f) Section 965(a) PTEP	(g) Section 965(b) PTEP	(h) Section 951A PTEP	(i) Section 245A(d) PTEP	(j) Section 951(a)(1)(A) PTEP	(k) Total
1a								
b								
c								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								

Part II Previously Taxed E&P in U.S. Dollars

		(a) Reclassified section 965(a) PTEP	(b) Reclassified section 965(b) PTEP	(c) General section 959(c)(1) PTEP
1 a	Balance at beginning of year (see instructions)			
b	Beginning balance adjustments (attach statement)			
c	Adjusted beginning balance (combine lines 1a and 1b)			
2	Reduction for taxes unsuspended under anti-splitter rules			
3	Previously taxed E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation			
4	Previously taxed E&P carried over in nonrecognition transaction			
5	Other adjustments (attach statement)			
6	Total previously taxed E&P (combine lines 1c through 5)			
7	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P			
8	Actual distributions of previously taxed E&P			
9	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P			
10	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)			
11	Other adjustments (attach statement)			
12	Balance at beginning of next year (combine lines 6 through 11)			

Schedule P (Form 5471) (Rev. 12-2020)

Part II Previously Taxed E&P in U.S. Dollars *(continued)*

	(d) Reclassified section 951A PTEP	(e) Reclassified section 245A(d) PTEP	(f) Section 965(a) PTEP	(g) Section 965(b) PTEP	(h) Section 951A PTEP	(i) Section 245A(d) PTEP	(j) Section 951(a)(1)(A) PTEP	(k) Total
1a								
b								
c								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								

Schedule P (Form 5471) (Rev. 12-2020)

**SCHEDULE Q
(Form 5471)**(Rev. December 2022)
Department of the Treasury
Internal Revenue Service**CFC Income by CFC Income Groups**

Attach to Form 5471.

OMB No. 1545-0123

Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

GBG ELITE MEDICAL SERVICES, S.A. DE C.V. (MEX

EIN (if any)

Reference ID number (see instructions)

00002

Complete a separate Schedule Q with respect to each applicable category of income (see instructions).

A Enter separate category code with respect to which this Schedule Q is being completed (see instructions for codes) GEN**B** If category code "PAS" is entered on line A, enter the applicable grouping code (see instructions)**C** If code "901j" is entered on line A, enter the country code for the sanctioned country (see instructions)

Complete a separate Schedule Q for U.S. source income and foreign source income (see instructions for an exception).

D Indicate whether this Schedule Q is being completed for: ☐ U.S. source income or ☒ Foreign source income

Complete a separate Schedule Q for FOGEI or FORI income.

E If this Schedule Q is being completed for FOGEI or FORI income, check this box ☐Enter amounts in functional currency
of the foreign corporation (unless
otherwise noted).

	(i) Country Code	(ii) Gross Income	(iii) Definitely Related Expenses	(iv) Related Person Interest Expense	(v) Other Interest Expense	(vi) Research & Experimental Expenses	(vii) Other Expenses (attach schedule)
1 Subpart F Income Groups							
a Dividends, Interest, Rents, Royalties, & Annuities (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
b Net Gain From Certain Property Transactions (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
c Net Gain From Commodities Transactions (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
d Net Foreign Currency Gain (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
e Income Equivalent to Interest (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
f Other							
(1) Unit name: _____							
(2) Unit name: _____							
g Foreign Base Company Sales Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							

Important: See **Computer-Generated Schedule Q** in instructions.

For Paperwork Reduction Act Notice, see instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

JSA

2X1650 3.000

0001W4 X45R

Schedule Q (Form 5471) (Rev. 12-2022)

Page **2**

	(viii) Current Year Tax on Reattributed Income From Disregarded Payments	(ix) Current Year Tax on All Other Disregarded Payments	(x) Other Current Year Taxes	(xi) Net Income (column (ii) less columns (iii) through (x))	(xii) Foreign Taxes for Which Credit Allowed (U.S. Dollars)	(xiii) Average Asset Value	(xiv) High Tax Election	(xv) Loss Allocation	(xvi) Net Income After Loss Allocation (column (xi) minus column (xv))
1									
a									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
b									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
c									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
d									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
e									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
f									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
g									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		

Important: See **Computer-Generated Schedule Q** in instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

Schedule Q (Form 5471) (Rev. 12-2022)

Page **3**

Enter amounts in functional currency of the foreign corporation (unless otherwise noted).

	(i) Country Code	(ii) Gross Income	(iii) Definitely Related Expenses	(iv) Related Person Interest Expense	(v) Other Interest Expense	(vi) Research & Experimental Expenses	(vii) Other Expenses (attach schedule)
1 Subpart F Income Groups							
h Foreign Base Company Services Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
i Full Inclusion Foreign Base Company Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
j Insurance Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
k International Boycott Income							
l Bribes, Kickbacks, and Other Payments							
m Section 901(j) income							
2 Recaptured Subpart F Income							
3 Tested Income Group (Total)		18,134,752.					14,847,263.
(1) Unit name: Tested Income	MX	18,134,752.					14,847,263.
(2) Unit name: _____							
4 Residual Income Group (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
5 Total		18,134,752.					14,847,263.

Important: See **Computer-Generated Schedule Q** in instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

Schedule Q (Form 5471) (Rev. 12-2022)

Page **4**

	(viii) Current Year Tax on Reattributed Income From Disregarded Payments	(ix) Current Year Tax on All Other Disregarded Payments	(x) Other Current Year Taxes	(xi) Net Income (column (ii) less columns (iii) through (x))	(xii) Foreign Taxes for Which Credit Allowed (U.S. Dollars)	(xiii) Average Asset Value	(xiv) High Tax Election	(xv) Loss Allocation	(xvi) Net Income After Loss Allocation (column (xi) minus column (xv))
1									
h									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
i									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
j									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
k									
l									
m									
2									
3				3,287,489.					3,287,489.
(1)				3,287,489.			<input type="checkbox"/>		3,287,489.
(2)							<input type="checkbox"/>		
4									
(1)									
(2)									
5				3,287,489.					3,287,489.

Important: See **Computer-Generated Schedule Q** in instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

**SCHEDULE R
(Form 5471)**

(December 2020)
Department of the Treasury
Internal Revenue Service

Distributions From a Foreign Corporation

► Attach to Form 5471.

OMB No. 1545-0123

► Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471		Identifying number
Global Benefits Group Inc		20-3842750
Name of foreign corporation	EIN (if any)	Reference ID number (see instructions)
GBG ELITE MEDICAL SERVICES, S.A. DE C.V. (MEX		00002

	(a) Description of distribution	(b) Date of distribution	(c) Amount of distribution in foreign corporation's functional currency	(d) Amount of E&P distribution in foreign corporation's functional currency
1	No Distributions	12/31/2022	NONE	NONE
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				

Form **5471**

(Rev. December 2022)

Department of the Treasury
Internal Revenue Service**Information Return of U.S. Persons With Respect
to Certain Foreign Corporations**Go to www.irs.gov/Form5471 for instructions and the latest information.Information furnished for the foreign corporation's annual accounting period (tax year required by
section 898) (see instructions) beginning 01/01/2022 , and ending 12/31/2022

OMB No. 1545-0123

Attachment
Sequence No. **121**

Name of person filing this return

Global Benefits Group Inc

Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address)

27051 Towne Centre Drive, #210

City or town, state, and ZIP code

FOOTHILL RANCH, CA 92610

Filer's tax year beginning 01/01/2022 , and ending 12/31/2022

D Check box if this is a final Form 5471 for the foreign corporation ☐**E** Check if any excepted specified foreign financial assets are reported on this form (see instructions). ☐**F** Check the box if this Form 5471 has been completed using "Alternative Information" under Rev. Proc. 2019-40 ☐**G** If the box on line F is checked, enter the corresponding code for "Alternative Information" (see instructions)**H** Person(s) on whose behalf this information return is filed:

(1) Name	(2) Address	(3) Identifying number	(4) Check applicable box(es)		
			Shareholder	Officer	Director
GLOBAL BENEFITS GROUP, INC	27422 PORTOLA PARKWAY STE 110, FOOTHILL RANCH C	20-3842750	X		

Important: Fill in all applicable lines and schedules. All information **must** be in English. All amounts **must** be stated in U.S. dollars unless otherwise indicated.

1a Name and address of foreign corporation GBG PREMIER, S.A.DE.C.V (MEXICO) Bosque de Ciruelos 180 PP 101 Bosques de las Lomas Mexico City, Miguel Hidalgo 11700 MX				b(1) Employer identification number, if any	
				b(2) Reference ID number (see instructions) 00003	
				c Country under whose laws incorporated MX	
d Date of incorporation 01/18/2018	e Principal place of business MX	f Principal business activity code number 542410	g Principal business activity Brokering & Management	h Functional currency code MXN	

2 Provide the following information for the foreign corporation's accounting period stated above.

a Name, address, and identifying number of branch office or agent (if any) in the United States	b If a U.S. income tax return was filed, enter:	
	(i) Taxable income or (loss)	(ii) U.S. income tax paid (after all credits)
c Name and address of foreign corporation's statutory or resident agent in country of incorporation		
d Name and address (including corporate department, if applicable) of person (or persons) with custody of the books and records of the foreign corporation, and the location of such books and records, if different		

Schedule A Stock of the Foreign Corporation

(a) Description of each class of stock	(b) Number of shares issued and outstanding	
	(i) Beginning of annual accounting period	(ii) End of annual accounting period
COMMON	200,000.	200,000.

For Paperwork Reduction Act Notice, see instructions.

Form **5471** (Rev. 12-2022)

Schedule B	Shareholders of Foreign Corporation
Part I	U.S. Shareholders of Foreign Corporation (see instructions)

Part I U.S. Shareholders of Foreign Corporation (see instructions)

Part II **Direct Shareholders of Foreign Corporation** (see instructions)Form **5471** (Rev. 12-2022)

Schedule C Income Statement (see instructions)

Important: Report all information in functional currency in accordance with U.S. generally accepted accounting principles (GAAP). Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules). However, if the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for dollar approximate separate transactions method (DASTM) corporations.

			Functional Currency	U.S. Dollars
Income	1a Gross receipts or sales	1a	10,271,863.	514,367.
	b Returns and allowances	1b		
	c Subtract line 1b from line 1a	1c	10,271,863.	514,367.
	2 Cost of goods sold	2		
	3 Gross profit (subtract line 2 from line 1c)	3	10,271,863.	514,367.
	4 Dividends	4		
	5 Interest	5		
	6a Gross rents	6a		
	b Gross royalties and license fees	6b		
	7 Net gain or (loss) on sale of capital assets	7		
Deductions	8a Foreign currency transaction gain or loss - unrealized	8a		
	b Foreign currency transaction gain or loss - realized	8b	182,414.	9,134.
	9 Other income (attach statement)	9		
	10 Total income (add lines 3 through 9)	10	10,454,277.	523,501.
	11 Compensation not deducted elsewhere	11		
	12a Rents	12a		
	b Royalties and license fees	12b		
	13 Interest	13		
	14 Depreciation not deducted elsewhere	14		
	15 Depletion	15		
Net Income	16 Taxes (exclude income tax expense (benefit))	16		
	17 Other deductions (attach statement - exclude income tax expense (benefit)). See Statement 49	17	249,107.	12,475.
	18 Total deductions (add lines 11 through 17)	18	249,107.	12,475.
	19 Net income or (loss) before unusual or infrequently occurring items, and income tax expense (benefit) (subtract line 18 from line 10) . .	19	10,205,170.	511,028.
Other Comprehensive Income	20 Unusual or infrequently occurring items	20		
	21a Income tax expense (benefit) - current	21a		
	b Income tax expense (benefit) - deferred	21b		
	22 Current year net income or (loss) per books (combine lines 19 through 21b) .	22	10,205,170.	511,028.
	23a Foreign currency translation adjustments	23a		
	b Other	23b		
	c Income tax expense (benefit) related to other comprehensive income	23c		
	24 Other comprehensive income (loss), net of tax (line 23a plus line 23b less line 23c).	24		

Form **5471** (Rev. 12-2022)

Schedule F Balance Sheet**Important:** Report all amounts in U.S. dollars prepared and translated in accordance with U.S. GAAP. See instructions for an exception for DASTM corporations.

Assets		(a) Beginning of annual accounting period	(b) End of annual accounting period
1 Cash	1	245,983.	122,619.
2a Trade notes and accounts receivable	2a	NONE	606,089.
b Less allowance for bad debts	2b	() ()	() ()
3 Derivatives	3		
4 Inventories	4		
5 Other current assets (attach statement).	5		
6 Loans to shareholders and other related persons	6		
7 Investment in subsidiaries (attach statement).	7		
8 Other investments (attach statement)	8		
9a Buildings and other depreciable assets	9a		
b Less accumulated depreciation.	9b	() ()	() ()
10a Depletable assets	10a		
b Less accumulated depletion	10b	() ()	() ()
11 Land (net of any amortization)	11		
12 Intangible assets:			
a Goodwill	12a		
b Organization costs.	12b		
c Patents, trademarks, and other intangible assets	12c		
d Less accumulated amortization for lines 12a, 12b, and 12c	12d	() ()	() ()
13 Other assets (attach statement) See Statement 50.	13	-619,272.	-624,780.
14 Total assets	14	-373,289.	103,928.
Liabilities and Shareholders' Equity			
15 Accounts payable	15		
16 Other current liabilities (attach statement) See Statement 50.	16	-125,534.	91,723.
17 Derivatives	17		
18 Loans from shareholders and other related persons	18		
19 Other liabilities (attach statement)	19		
20 Capital stock:			
a Preferred stock	20a		
b Common stock	20b		
21 Paid-in or capital surplus (attach reconciliation)	21		
22 Retained earnings	22	498,823.	12,205.
23 Less cost of treasury stock	23	() ()	() ()
24 Total liabilities and shareholders' equity	24	373,289.	103,928.

Schedule G Other Information

	Yes	No
1 During the tax year, did the foreign corporation own at least a 10% interest, directly or indirectly, in any foreign partnership? If "Yes," see the instructions for required statement.		X
2 During the tax year, did the foreign corporation own an interest in any trust?		X
3 During the tax year, did the foreign corporation own any foreign entities that were disregarded as separate from their owner under Regulations sections 301.7701-2 and 301.7701-3 or did the foreign corporation own any foreign branches (see instructions)? If "Yes," you are generally required to attach Form 8858 for each entity or branch (see instructions).		X
4a During the tax year, did the filer pay or accrue any base erosion payment under section 59A(d) to the foreign corporation or did the filer have a base erosion tax benefit under section 59A(c)(2) with respect to a base erosion payment made or accrued to the foreign corporation (see instructions)? If "Yes," complete lines 4b and 4c.		X
b Enter the total amount of the base erosion payments. \$ _____		
c Enter the total amount of the base erosion tax benefit \$ _____		
5a During the tax year, did the foreign corporation pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? If "Yes," complete line 5b.		X
b Enter the total amount of the disallowed deductions (see instructions) \$ _____		

Schedule G Other Information (continued)

	Yes	No
6a Is the filer claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any transactions with the foreign corporation? If "Yes," complete lines 6b, 6c, and 6d. See instructions.		X
b Enter the amount of gross receipts derived from all sales of general property to the foreign corporation that the filer included in its computation of foreign-derived deduction eligible income (FDDEI) \$ _____		
c Enter the amount of gross income derived from a license of property to the foreign corporation that the filer included in its computation of FDDEI (see instructions) \$ _____		
d Enter the amount of gross income derived from services provided to the foreign corporation that the filer included in its computation of FDDEI (see instructions) \$ _____		
7 During the tax year, was the foreign corporation a participant in any cost sharing arrangement? If the answer to question 7 is "Yes," complete a separate Schedule G-1 for each cost sharing arrangement in which the foreign corporation was a participant during the tax year.		X
8 From April 25, 2014, to December 31, 2017, did the foreign corporation purchase stock or securities of a shareholder of the foreign corporation for use in a triangular reorganization (within the meaning of Regulations section 1.358-6(b)(2))?		X
9a Did the foreign corporation receive any intangible property in a prior year or the current tax year for which the U.S. transferor is required to report a section 367(d) annual income inclusion for the taxable year? If "Yes," go to line 9b.		X
b Enter in functional currency the amount of the earnings and profits reduction pursuant to section 367(d)(2)(B) for the tax year \$ _____		
10 During the tax year, was the foreign corporation an expatriated foreign subsidiary under Regulations section 1.7874-12(a)(9)? If "Yes," see instructions and attach statement.		X
11 During the tax year, did the foreign corporation participate in any reportable transaction as defined in Regulations section 1.6011-4? If "Yes," attach Form(s) 8886 if required by Regulations section 1.6011-4(c)(3)(i)(G).		X
12 During the tax year, did the foreign corporation pay or accrue any foreign tax that was disqualified for credit under section 901(m)?		X
13 During the tax year, did the foreign corporation pay or accrue foreign taxes to which section 909 applies, or treat foreign taxes that were previously suspended under section 909 as no longer suspended?		X
14 Did you answer "Yes" to any of the questions in the instructions for line 14? If "Yes," enter the corresponding code(s) from the instructions and attach statement _____		X
15 Does the foreign corporation have interest expense disallowed under section 163(j) (see instructions)? If "Yes," enter the amount \$ _____		X
16 Does the foreign corporation have previously disallowed interest expense under section 163(j) carried forward to the current tax year (see instructions)? If "Yes," enter the amount \$ _____		X
17a Did any extraordinary reduction with respect to a controlling section 245A shareholder occur during the tax year (see instructions)?		X
b If the answer to question 17a is "Yes," was an election made to close the tax year such that no amount is treated as an extraordinary reduction amount or tiered extraordinary reduction amount (see instructions)?		
18 Does the reporting corporation have any loan to or from the related party to which the safe-haven rate rules of Regulations section 1.482-2(a)(2)(iii)(B) are applicable, and for which the reporting corporation used a rate of interest within the safe-haven range of Regulations section 1.482-2(a)(2)(iii)(B)(1) (100% to 130% of the AFR for the relevant term)?		X
19a Did the reporting corporation make at least one distribution or acquisition (as defined by Regulations section 1.385-3) during the period including the tax year and the preceding 3 tax years, or, during the period beginning 36 months before the date of the respective distribution or acquisition and ending 36 months afterward, did the reporting corporation issue or refinance indebtedness owed to a related party?		X
b If the answer to question 19a is "Yes," provide the following. (1) The amount of such distribution(s) and acquisition(s) \$ _____ (2) The amount of such related party indebtedness \$ _____		

Schedule I Summary of Shareholder's Income From Foreign Corporation (see instructions)

If item H on page 1 is completed, a separate Schedule I must be filed for each Category 4, 5a, or 5b filer for whom reporting is furnished on this Form 5471. This Schedule I is being completed for:

Name of U.S. shareholder Global Benefits Group Inc

Identifying number 20-3842750

1a	Section 964(e)(4) subpart F dividend income from the sale of stock of a lower-tier foreign corporation (see instructions)	1a	
b	Section 245A(e)(2) subpart F income from hybrid dividends of tiered corporations (see instructions) . . .	1b	
c	Subpart F income from tiered extraordinary disposition amounts not eligible for subpart F exception under section 954(c)(6)	1c	
d	Subpart F income from tiered extraordinary reduction amounts not eligible for subpart F exception under section 954(c)(6)	1d	
e	Section 954(c) Subpart F Foreign Personal Holding Company Income (enter result from Worksheet A) . .	1e	
f	Section 954(d) Subpart F Foreign Base Company Sales Income (enter result from Worksheet A)	1f	
g	Section 954(e) Subpart F Foreign Base Company Services Income (enter result from Worksheet A) . .	1g	
h	Other subpart F income (enter result from Worksheet A)	1h	
2	Earnings invested in U.S. property (enter the result from Worksheet B)	2	
3	Reserved for future use	3	
4	Factoring income See instructions for reporting amounts on lines 1, 2, and 4 on your income tax return.	4	
5a	Section 245A eligible dividends (see instructions)	5a	
b	Extraordinary disposition amounts (see instructions)	5b	
c	Extraordinary reduction amounts (see instructions)	5c	
d	Section 245A(e) dividends (see instructions)	5d	
e	Dividends not reported on line 5a, 5b, 5c, or 5d	5e	
6	Exchange gain or (loss) on a distribution of previously taxed earnings and profits	6	

	Yes	No
7a Was any income of the foreign corporation blocked?		
b Did any such income become unblocked during the tax year (see section 964(b))?		
If the answer to either question is "Yes," attach an explanation.		
8a Did this U.S. shareholder have an extraordinary disposition (ED) account with respect to the foreign corporation at any time during the tax year (see instructions)?		
b If the answer to question 8a is "Yes," enter the U.S. shareholder's ED account balance at the beginning of the CFC year \$ _____ and at the end of the tax year \$ _____. Provide an attachment detailing any changes from the beginning to the ending balances.		
c Enter the CFC's aggregate ED account balance with respect to all U.S. shareholders at the beginning of the CFC year \$ _____ and at the end of the tax year \$ _____. Provide an attachment detailing any changes from the beginning to the ending balances.		
9 Enter the sum of the hybrid deduction accounts with respect to stock of the foreign corporation (see instructions) \$ _____		

Form **5471** (Rev. 12-2022)

**SCHEDULE E
(Form 5471)**

(Rev. December 2021)

Department of the Treasury
Internal Revenue Service**Income, War Profits, and Excess Profits Taxes Paid or Accrued**

▶ Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471

Global Benefits Group Inc

Name of foreign corporation

GBG PREMIER, S.A.DE.C.V (MEXICO)

Identifying number

20-3842750

Reference ID number (see instructions)

00003

- a** Separate Category (Enter code - see instructions). ▶ GEN
- b** If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions). ▶
- c** If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶

Part I Taxes for Which a Foreign Tax Credit Is Allowed**Section 1 - Taxes Paid or Accrued Directly by Foreign Corporation**

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Unsuspended Taxes	(d) Country or U.S. Possession to Which Tax Is Paid (Enter code - see instructions. Use a separate line for each.)	(e) Foreign Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)	(f) U.S. Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)
1	GBG PREMIER, S.A.DE.C.V (MEXICO)	00003		MX	2022/01/01	2022/12/31
2						
3						
4						

	(g) Income Subject to Tax in the Foreign Jurisdiction (see instructions)	(h) If taxes are paid on U.S. source income, check box	(i) Local Currency in Which Tax Is Payable (enter code - see instructions)	(j) Tax Paid or Accrued (in local currency in which the tax is payable)	(k) Conversion Rate to U.S. Dollars	(l) In U.S. Dollars (divide column (j) by column (k))	(m) In Functional Currency of Foreign Corporation
1	NONE		MXN	NONE	19.9698500	NONE	NONE
2							
3							
4							
5	Total (combine lines 1 through 4 of column (l)). Also report amount on Schedule E-1, line 4 ▶					NONE	
6	Total (combine lines 1 through 4 of column (m)) ▶						NONE

Section 2 - Taxes Deemed Paid by Foreign Corporation

	(a) Name of Lower-Tier Distributing Foreign Corporation	(b) EIN or Reference ID Number of Lower-Tier Distributing Foreign Corporation	(c) Country or U.S. Possession to Which Tax Is Paid (Enter code - see instructions. Use a separate line for each.)	(d) PTEP Group (enter code)	(e) Annual PTEP Account (enter year)
1					
2					
3					
4					

	(f) PTEP Distributed (enter amount in functional currency)	(g) Total Amount of PTEP in the PTEP Group (in functional currency)	(h) Total Amount of the PTEP Group Taxes With Respect to PTEP Group (USD)	(i) Foreign Income Taxes Properly Attributable to PTEP and not Previously Deemed Paid ((column (f)/column (g)) x column (h)) (USD)
1				
2				
3				
4				
5	Total (combine lines 1 through 4 of column (i)). Also report amount on Schedule E-1, line 6 ▶			

For Paperwork Reduction Act Notice, see instructions.

Schedule E (Form 5471) (Rev. 12-2021)

JSA

2X1666 2.000

0001W4 X45R

Name of foreign corporation GBG PREMIER, S.A.DE.C.V (MEXICO)	EIN (if any)	Reference ID number (see instructions) 00003
a Separate Category (Enter code-see instructions).		▶ GEN
b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions)		▶
c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions)		▶

Part II Election

For tax years beginning after December 31, 2004, has an election been made under section 986(a)(1)(D) to translate taxes using the exchange rate on the date of payment?

☐ Yes ☒ No If "Yes," state date of election ▶
Part III Taxes for Which a Foreign Tax Credit Is Disallowed (Enter in functional currency of foreign corporation.)

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Section 901(j)	(d) Section 901(k) and (l)	(e) Section 901(m)	(f) U.S. Taxes	(g) Suspended Taxes	(h) Other	(i) Total
1									
2									
3	In functional currency (combine lines 1 and 2)								▶
4	In U.S. dollars (translated at the average exchange rate, as defined in section 989(b)(3) and related regulations (see instructions)).								▶

Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Earnings and Profits (E&P) of Foreign Corporation**IMPORTANT:** Enter amounts in U.S. dollars.

		Taxes related to:			
		(a) Subpart F Income	(b) Tested Income	(c) Residual Income	(d) Suspended Taxes
1a	Balance at beginning of year (as reported in prior year Schedule E-1)	-0-	-0-	-0-	
b	Beginning balance adjustments (attach statement).				
c	Adjusted beginning balance (combine lines 1a and 1b)				
2	Adjustment for foreign tax redetermination.				
3a	Taxes unsuspended under anti-splitter rules				
b	Taxes suspended under anti-splitter rules.				
4	Taxes reported on Schedule E, Part I, Section 1, line 5, column (l)				
5	Taxes carried over in nonrecognition transactions				
6	Taxes reported on Schedule E, Part I, Section 2, line 5, column (i).				
7	Other adjustments (attach statement).				
8	Taxes paid or accrued on current income/E&P or accumulated E&P (combine lines 1c through 7)				
9	Taxes deemed paid with respect to inclusions (see instructions)				
10	Taxes deemed paid with respect to actual distributions				
11	Taxes on amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P				
12	Other (attach statement).				
13	Balance of taxes paid or accrued (combine lines 8 through 12 in columns (a), (b), and (c))				
14	Reserved for future use				
15	Reduction for other taxes not deemed paid.				
16	Balance of taxes paid or accrued at the beginning of the next year. Line 16, columns (a), (b), and (c) must always equal zero. So, if necessary, enter negative amounts on line 15 of columns (a), (b), and (c) in amounts sufficient to reduce line 13, columns (a), (b), and (c) to zero. For the remaining columns, combine lines 8 through 12	-0-	-0-	-0-	

Schedule E (Form 5471) (Rev. 12-2021)

Page **3**

Name of foreign corporation	EIN (if any)	Reference ID number (see instructions)
GBG PREMIER, S.A.DE.C.V (MEXICO)		00003

- a** Separate Category (Enter code - see instructions.) ▶ GEN
- b** If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶
- c** If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶

Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Accumulated Earnings and Profits (E&P) of Foreign Corporation (continued)

(e) Taxes related to previously taxed E&P (see instructions)

	(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP
1a										
b										
c										
2										
3a										
b										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										

Schedule E (Form 5471) (Rev. 12-2021)

Document Page 224 of 322
Current Earnings and ProfitsSCHEDULE H
(Form 5471)(Rev. December 2021)
Department of the Treasury
Internal Revenue Service

▶ Attach to Form 5471.

OMB No. 1545-0123

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471 Global Benefits Group Inc		Identifying number 20-3842750
Name of foreign corporation GBG PREMIER, S.A.DE.C.V (MEXICO)	EIN (if any)	Reference ID number (see instructions) 00003

IMPORTANT: Enter the amounts on lines 1 through 5c in **functional** currency.

1	Current year net income or (loss) per foreign books of account.			1	10,205,170.
2	Net adjustments made to line 1 to determine current earnings and profits according to U.S. financial and tax accounting standards (see instructions):	Net Additions	Net Subtractions		
a	Capital gains or losses.	2a			
b	Depreciation and amortization.	2b			
c	Depletion.	2c			
d	Investment or incentive allowance.	2d			
e	Charges to statutory reserves.	2e			
f	Inventory adjustments.	2f			
g	Income taxes (see Schedule E, Part I, Section 1, line 6, column (m), and Part III, line 3, column (i)).	2g			
h	Foreign currency gains or losses.	2h			
i	Other (attach statement).	2i			
3	Total net additions.	3			
4	Total net subtractions.	4			
5a	Current earnings and profits (line 1 plus line 3 minus line 4).			5a	10,205,170.
b	DASTM gain or (loss) for foreign corporations that use DASTM (see instructions).			5b	
c	Combine lines 5a and 5b and enter the result on line 5c. Then enter on lines 5c(i), 5c(ii), and 5c(iii)(A) through 5c(iii)(D) the portion of the line 5c amount with respect to the categories of income shown on those lines.			5c	10,205,170.
	(i) General category (enter amount on applicable Schedule J, Part I, line 3, column (a)).	5c(i)			
	(ii) Passive category (enter amount on applicable Schedule J, Part I, line 3, column (a)).	5c(ii)			
	(iii) Section 901(j) category:				
	(A) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(A) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(A)			
	(B) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(B) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(B)			
	(C) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(C) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(C)			
	(D) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(D) and on the applicable Schedule J, Part I, line 3, column (a).	5c(iii)(D)			
d	Current earnings and profits in U.S. dollars (line 5c translated at the average exchange rate, as defined in section 989(b)(3) and the related regulations (see instructions)).			5d	523,966.
e	Enter exchange rate used for line 5d. ▶		19.4767890		

For Paperwork Reduction Act Notice, see instructions.

Schedule H (Form 5471) (Rev. 12-2021)

**SCHEDULE I-1
(Form 5471)**

(Rev. December 2021)

Department of the Treasury
Internal Revenue Service**Information for Global Intangible Low-Taxed Income**

► Attach to Form 5471.

► Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

GBG PREMIER, S.A.DE.C.V (MEXICO)

EIN (if any)

Reference ID number (see instructions)

00003

Separate Category (Enter code - see instructions.)

► GEN

		Functional Currency	Conversion Rate	U.S. Dollars
1 Gross income (see instructions if cost of goods sold exceed gross receipts)	1	10,454,277.		
2 Exclusions (see instructions if cost of goods sold exceed gross receipts)				
a Effectively connected income	2a			
b Subpart F income	2b			
c High-tax exception income per section 954(b)(4)	2c			
d Related party dividends	2d			
e Foreign oil and gas extraction income	2e			
3 Total exclusions (combine lines 2a through 2e)	3			
4 Gross income less total exclusions (line 1 minus line 3) (see instructions)	4	10,454,277.		
5 Deductions properly allocable to amount on line 4	5	249,107.		
6 Tested income (loss) (line 4 minus line 5) (see instructions)	6	10,205,170.		
7 Tested foreign income taxes	7		19.9698500	
8 Qualified business asset investment (QBAI)	8		19.9698500	
9a Interest expense included on line 5	9a			
b Qualified interest expense	9b			
c Tested loss QBAI amount	9c			
d Tested interest expense (line 9a minus the sum of line 9b and line 9c). If zero or less, enter -0-	9d		19.9698500	
10a Interest income included in line 4	10a			
b Qualified interest income	10b			
c Tested interest income (line 10a minus line 10b). If zero or less, enter -0-	10c		19.9698500	

For Paperwork Reduction Act Notice, see instructions.

Schedule I-1 (Form 5471) (Rev. 12-2021)

**SCHEDULE J
(Form 5471)**(Rev. December 2020)
Department of the Treasury
Internal Revenue Service**Accumulated Earnings & Profits (E&P) of Controlled Foreign Corporation**► **Attach to Form 5471.**

OMB No. 1545-0123

► **Go to www.irs.gov/Form5471 for instructions and the latest information.**

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

GBG PREMIER, S.A.DE.C.V (MEXICO)

EIN (if any)

Reference ID number (see instructions)

00003

a Separate Category (Enter code - see instructions.) ► GEN**b** If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ►**Part I Accumulated E&P of Controlled Foreign Corporation**☐ Check the box if person filing return does not have all U.S. shareholders' information to complete an amount in column (e) (see instructions).**Important:** Enter amounts in functional currency.

		(a) Post-2017 E&P Not Previously Taxed (post-2017 section 959(c)(3) balance)	(b) Post-1986 Undistributed Earnings (post-1986 and pre-2018 section 959(c)(3) balance)	(c) Pre-1987 E&P Not Previously Taxed (pre-1987 section 959(c)(3) balance)	(d) Hovering Deficit and Deduction for Suspended Taxes	(e) Previously Taxed E&P (see instructions)	
						(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP
1a	Balance at beginning of year (as reported on prior year Schedule J)	-7,521,107.					
b	Beginning balance adjustments (attach statement)						
c	Adjusted beginning balance (combine lines 1a and 1b)	-7,521,107.					
2a	Reduction for taxes unsuspended under anti-splitter rules						
b	Disallowed deduction for taxes suspended under anti-splitter rules						
3	Current year E&P (or deficit in E&P) (enter amount from applicable line 5c of Schedule H)	10,205,170.					
4	E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation						
5a	E&P carried over in nonrecognition transaction						
b	Reclassify deficit in E&P as hovering deficit after nonrecognition transaction						
6	Other adjustments (attach statement)						
7	Total current and accumulated E&P (combine lines 1c through 6)	2,684,063.					
8	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P						
9	Actual distributions						
10	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P						
11	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)						
12	Other adjustments (attach statement)						
13	Hovering deficit offset of undistributed post- transaction E&P (see instructions)						
14	Balance at beginning of next year (combine lines 7 through 13)	2,684,063.					

For Paperwork Reduction Act Notice, see the Instructions for Form 5471.**Schedule J (Form 5471) (Rev. 12-2020)**

JSA

2X1665 2.000

0001W4 X45R

Part I Accumulated E&P of Controlled Foreign Corporation (continued)

(e) Previously Taxed E&P (see instructions)					
	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP
1 a					
b					
c					
2 a					
b					
3					
4					
5 a					
b					
6					
7					
8					
9					
10					
11					
12					
13					
14					

(e) Previously Taxed E&P (see instructions)				(f)
	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP	Total Section 964(a) E&P (combine columns (a), (b), (c), and (e)(i) through (e)(x))
1 a				-7,521,107.
b				
c				-7,521,107.
2 a				
b				
3				10,205,170.
4				
5 a				
b				
6				
7				2,684,063.
8				
9				
10				
11				
12				
13				
14				2,684,063.

Part II **Nonpreviously Taxed E&P Subject to Recapture as Subpart F Income (section 952(c)(2))**

Important: Enter amounts in functional currency.

1	Balance at beginning of year	▶	1	
2	Additions (amounts subject to future recapture).	▶	2	
3	Subtractions (amounts recaptured in current year)	▶	3	
4	Balance at end of year (combine lines 1 through 3)	▶	4	

Schedule J (Form 5471) (Rev. 12-2020)

SCHEDULE M
(Form 5471)(Rev. December 2021)
Department of the Treasury
Internal Revenue Service**Transactions Between Controlled Foreign Corporation
and Shareholders or Other Related Persons**

OMB No. 1545-0123

▶ Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471

Identifying number

Global Benefits Group Inc

20-3842750

Name of foreign corporation

EIN (if any)

Reference ID number (see instructions)

GBG PREMIER, S.A.DE.C.V (MEXICO)

00003

Important: Complete a **separate** Schedule M for each controlled foreign corporation. Enter the totals for each type of transaction that occurred during the annual accounting period between the foreign corporation and the persons listed in columns (b) through (f). All amounts must be stated in U.S. dollars translated from functional currency at the average exchange rate for the foreign corporation's tax year. See instructions.

Enter the relevant functional currency and the exchange rate used throughout this schedule ▶

PESO

(a) Transactions of foreign corporation	(b) U.S. person filing this return	(c) Any domestic corporation or partnership controlled by U.S. person filing this return	(d) Any other foreign corporation or partnership controlled by U.S. person filing this return	(e) 10% or more U.S. shareholder of controlled foreign corporation (other than the U.S. person filing this return)	(f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation
1 Sales of stock in trade (inventory)					
2 Sales of tangible property other than stock in trade					
3 Sales of property rights (patents, trademarks, etc.).					
4 Platform contribution transaction payments received					
5 Cost sharing transaction payments received					
6 Compensation received for technical, managerial, engineering, construction, or like services . .					
7 Commissions received	-514,368.				
8 Rents, royalties, and license fees received					
9 Hybrid dividends received (see instructions)					
10 Dividends received (exclude hybrid dividends, deemed distributions under subpart F, and distributions of previously taxed income)					
11 Interest received.					
12 Premiums received for insurance or reinsurance.					
13 Loan guarantee fees received .					
14 Other amounts received (attach statement)					
15 Add lines 1 through 14	-514,368.				
16 Purchases of stock in trade (inventory)					
17 Purchases of tangible property other than stock in trade. . . .					
18 Purchases of property rights (patents, trademarks, etc.) . . .					
19 Platform contribution transaction payments paid					
20 Cost sharing transaction payments paid .					
21 Compensation paid for technical, managerial, engineering, construction, or like services . .					
22 Commissions paid					
23 Rents, royalties, and license fees paid					
24 Hybrid dividends paid (see instructions)					
25 Dividends paid (exclude hybrid dividends paid)					
26 Interest paid					
27 Premiums paid for insurance or reinsurance					
28 Loan guarantee fees paid . . .					
29 Other amounts paid (attach statement). .					
30 Add lines 16 through 29. . . .					

For Paperwork Reduction Act Notice, see the Instructions for Form 5471.

Schedule M (Form 5471) (Rev. 12-2021)

Schedule M (Form 5471) (Rev. 12-2021)

Page 2

Name of person filing Form 5471

Identifying number

(a) Transactions of foreign corporation	(b) U.S. person filing this return	(c) Any domestic corporation or partnership controlled by U.S. person filing this return	(d) Any other foreign corporation or partnership controlled by U.S. person filing this return	(e) 10% or more U.S. shareholder of controlled foreign corporation (other than the U.S. person filing this return)	(f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation
31 Accounts Payable	351,087.		273,695.		
32 Amounts borrowed (enter the maximum loan balance during the year) - see instructions					
33 Accounts Receivable					
34 Amounts loaned (enter the maximum loan balance during the year) - see instructions					

Schedule M (Form 5471) (Rev. 12-2021)

**SCHEDULE P
(Form 5471)**

(Rev. December 2020)

Department of the Treasury
Internal Revenue Service**Previously Taxed Earnings and Profits of U.S. Shareholder
of Certain Foreign Corporations**

▶ Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471

Global Benefits Group Inc

Name of U.S. shareholder

Global Benefits Group Inc

Name of foreign corporation

GBG PREMIER, S.A.DE.C.V (MEXICO)

EIN (if any)

Identifying number

20-3842750

Identifying number

20-3842750

Reference ID number (see instructions)

00003

a Separate Category (Enter code - see instructions.)

GEN

b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions)**Part I Previously Taxed E&P in Functional Currency** (see instructions)

		(a) Reclassified section 965(a) PTEP	(b) Reclassified section 965(b) PTEP	(c) General section 959(c)(1) PTEP
1a	Balance at beginning of year (see instructions)			
b	Beginning balance adjustments (attach statement)			
c	Adjusted beginning balance (combine lines 1a and 1b)			
2	Reduction for taxes unsuspended under anti-splitter rules			
3	Previously taxed E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation			
4	Previously taxed E&P carried over in nonrecognition transaction			
5	Other adjustments (attach statement)			
6	Total previously taxed E&P (combine lines 1c through 5)			
7	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P			
8	Actual distributions of previously taxed E&P			
9	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P			
10	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)			
11	Other adjustments (attach statement)			
12	Balance at beginning of next year (combine lines 6 through 11)			

For Paperwork Reduction Act Notice, see instructions.

Schedule P (Form 5471) (Rev. 12-2020)

Part I **Previously Taxed E&P in Functional Currency** (see instructions) *(continued)*

	(d) Reclassified section 951A PTEP	(e) Reclassified section 245A(d) PTEP	(f) Section 965(a) PTEP	(g) Section 965(b) PTEP	(h) Section 951A PTEP	(i) Section 245A(d) PTEP	(j) Section 951(a)(1)(A) PTEP	(k) Total
1a								
b								
c								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								

Part II Previously Taxed E&P in U.S. Dollars

		(a) Reclassified section 965(a) PTEP	(b) Reclassified section 965(b) PTEP	(c) General section 959(c)(1) PTEP
1 a	Balance at beginning of year (see instructions)			
b	Beginning balance adjustments (attach statement)			
c	Adjusted beginning balance (combine lines 1a and 1b)			
2	Reduction for taxes unsuspended under anti-splitter rules			
3	Previously taxed E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation			
4	Previously taxed E&P carried over in nonrecognition transaction			
5	Other adjustments (attach statement)			
6	Total previously taxed E&P (combine lines 1c through 5)			
7	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P			
8	Actual distributions of previously taxed E&P			
9	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P			
10	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)			
11	Other adjustments (attach statement)			
12	Balance at beginning of next year (combine lines 6 through 11)			

Schedule P (Form 5471) (Rev. 12-2020)

Part II Previously Taxed E&P in U.S. Dollars *(continued)*

	(d) Reclassified section 951A PTEP	(e) Reclassified section 245A(d) PTEP	(f) Section 965(a) PTEP	(g) Section 965(b) PTEP	(h) Section 951A PTEP	(i) Section 245A(d) PTEP	(j) Section 951(a)(1)(A) PTEP	(k) Total
1a								
b								
c								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								

Schedule P (Form 5471) (Rev. 12-2020)

**SCHEDULE Q
(Form 5471)**(Rev. December 2022)
Department of the Treasury
Internal Revenue Service**CFC Income by CFC Income Groups**

Attach to Form 5471.

Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471

Global Benefits Group Inc

Identifying number

20-3842750

Name of foreign corporation

GBG PREMIER, S.A.DE.C.V (MEXICO)

EIN (if any)

Reference ID number (see instructions)

00003

Complete a separate Schedule Q with respect to each applicable category of income (see instructions).

A Enter separate category code with respect to which this Schedule Q is being completed (see instructions for codes) GEN**B** If category code "PAS" is entered on line A, enter the applicable grouping code (see instructions)**C** If code "901j" is entered on line A, enter the country code for the sanctioned country (see instructions)

Complete a separate Schedule Q for U.S. source income and foreign source income (see instructions for an exception).

D Indicate whether this Schedule Q is being completed for: ☐ U.S. source income or ☒ Foreign source income

Complete a separate Schedule Q for FOGEI or FORI income.

E If this Schedule Q is being completed for FOGEI or FORI income, check this box ☐Enter amounts in functional currency
of the foreign corporation (unless
otherwise noted).

	(i) Country Code	(ii) Gross Income	(iii) Definitely Related Expenses	(iv) Related Person Interest Expense	(v) Other Interest Expense	(vi) Research & Experimental Expenses	(vii) Other Expenses (attach schedule)
1 Subpart F Income Groups							
a Dividends, Interest, Rents, Royalties, & Annuities (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
b Net Gain From Certain Property Transactions (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
c Net Gain From Commodities Transactions (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
d Net Foreign Currency Gain (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
e Income Equivalent to Interest (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
f Other							
(1) Unit name: _____							
(2) Unit name: _____							
g Foreign Base Company Sales Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							

Important: See **Computer-Generated Schedule Q** in instructions.

For Paperwork Reduction Act Notice, see instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

JSA

2X1650 3.000

0001W4 X45R

Schedule Q (Form 5471) (Rev. 12-2022)

Page **2**

	(viii) Current Year Tax on Reattributed Income From Disregarded Payments	(ix) Current Year Tax on All Other Disregarded Payments	(x) Other Current Year Taxes	(xi) Net Income (column (ii) less columns (iii) through (x))	(xii) Foreign Taxes for Which Credit Allowed (U.S. Dollars)	(xiii) Average Asset Value	(xiv) High Tax Election	(xv) Loss Allocation	(xvi) Net Income After Loss Allocation (column (xi) minus column (xv))
1									
a									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
b									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
c									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
d									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
e									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
f									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
g									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		

Important: See **Computer-Generated Schedule Q** in instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

Schedule Q (Form 5471) (Rev. 12-2022)

Page **3**

Enter amounts in functional currency of the foreign corporation (unless otherwise noted).

	(i) Country Code	(ii) Gross Income	(iii) Definitely Related Expenses	(iv) Related Person Interest Expense	(v) Other Interest Expense	(vi) Research & Experimental Expenses	(vii) Other Expenses (attach schedule)
1 Subpart F Income Groups							
h Foreign Base Company Services Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
i Full Inclusion Foreign Base Company Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
j Insurance Income (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
k International Boycott Income							
l Bribes, Kickbacks, and Other Payments							
m Section 901(j) income							
2 Recaptured Subpart F Income							
3 Tested Income Group (Total)		10,454,277.					249,107.
(1) Unit name: Tested Income	MX	10,454,277.					249,107.
(2) Unit name: _____							
4 Residual Income Group (Total)							
(1) Unit name: _____							
(2) Unit name: _____							
5 Total		10,454,277.					249,107.

Important: See **Computer-Generated Schedule Q** in instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

Schedule Q (Form 5471) (Rev. 12-2022)

Page **4**

	(viii) Current Year Tax on Reattributed Income From Disregarded Payments	(ix) Current Year Tax on All Other Disregarded Payments	(x) Other Current Year Taxes	(xi) Net Income (column (ii) less columns (iii) through (x))	(xii) Foreign Taxes for Which Credit Allowed (U.S. Dollars)	(xiii) Average Asset Value	(xiv) High Tax Election	(xv) Loss Allocation	(xvi) Net Income After Loss Allocation (column (xi) minus column (xv))
1									
h									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
i									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
j									
(1)							<input type="checkbox"/>		
(2)							<input type="checkbox"/>		
k									
l									
m									
2									
3				10,205,170.					10,205,170.
(1)				10,205,170.			<input type="checkbox"/>		10,205,170.
(2)							<input type="checkbox"/>		
4									
(1)									
(2)									
5				10,205,170.					10,205,170.

Important: See **Computer-Generated Schedule Q** in instructions.

Schedule Q (Form 5471) (Rev. 12-2022)

**SCHEDULE R
(Form 5471)**

(December 2020)
Department of the Treasury
Internal Revenue Service

Distributions From a Foreign Corporation

► Attach to Form 5471.

OMB No. 1545-0123

► Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471		Identifying number
Global Benefits Group Inc		20-3842750
Name of foreign corporation	EIN (if any)	Reference ID number (see instructions)
GBG PREMIER, S.A.DE.C.V (MEXICO)		00003

	(a) Description of distribution	(b) Date of distribution	(c) Amount of distribution in foreign corporation's functional currency	(d) Amount of E&P distribution in foreign corporation's functional currency
1	No Distributions	12/31/2022	NONE	NONE
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				

Form **5471**

(Rev. December 2022)

Department of the Treasury
Internal Revenue Service**Information Return of U.S. Persons With Respect
to Certain Foreign Corporations**

OMB No. 1545-0123

Attachment
Sequence No. **121**Go to www.irs.gov/Form5471 for instructions and the latest information.Information furnished for the foreign corporation's annual accounting period (tax year required by
section 898) (see instructions) beginning 01/01/2022 , and ending 12/31/2022

Name of person filing this return <u>Global Benefits Group Inc</u>	A Identifying number <u>20-3842750</u>
Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address) <u>27051 Towne Centre Drive, #210</u>	B Category of filer (See instructions. Check applicable box(es).): 1a <input checked="" type="checkbox"/> 1b <input type="checkbox"/> 1c <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 5a <input checked="" type="checkbox"/> 5b <input type="checkbox"/> 5c <input type="checkbox"/>
City or town, state, and ZIP code <u>FOOTHILL RANCH, CA 92610</u>	C Enter the total percentage of the foreign corporation's voting stock you owned at the end of its annual accounting period _____ %
Filer's tax year beginning <u>01/01/2022</u> , and ending <u>12/31/2022</u>	
D Check box if this is a final Form 5471 for the foreign corporation <input type="checkbox"/>	
E Check if any excepted specified foreign financial assets are reported on this form (see instructions). <input type="checkbox"/>	
F Check the box if this Form 5471 has been completed using "Alternative Information" under Rev. Proc. 2019-40 <input type="checkbox"/>	
G If the box on line F is checked, enter the corresponding code for "Alternative Information" (see instructions) _____	
H Person(s) on whose behalf this information return is filed:	

(1) Name	(2) Address	(3) Identifying number	(4) Check applicable box(es)		
			Shareholder	Officer	Director
GLOBAL BENEFITS GROUP, INC	27422 PORTOLA PARKWAY STE 110, FOOTHILL RANCH C	20-3842750	X		

Important: Fill in all applicable lines and schedules. All information **must** be in English. All amounts **must** be stated in U.S. dollars unless otherwise indicated.

1a Name and address of foreign corporation <u>GBG PARAGUAY SOCIEDAD ANONIMA</u> <u>Pascual Toledo 4461</u> <u>, PA</u>			b(1) Employer identification number, if any		
			b(2) Reference ID number (see instructions) <u>00006</u>		
			c Country under whose laws incorporated <u>PA</u>		
d Date of incorporation <u>08/10/2018</u>	e Principal place of business <u>PA</u>	f Principal business activity code number <u>542410</u>	g Principal business activity <u>BROKERING & MANAGEMENT</u>	h Functional currency code <u>PYG</u>	

2 Provide the following information for the foreign corporation's accounting period stated above.

a Name, address, and identifying number of branch office or agent (if any) in the United States	b If a U.S. income tax return was filed, enter:	
	(i) Taxable income or (loss)	(ii) U.S. income tax paid (after all credits)
c Name and address of foreign corporation's statutory or resident agent in country of incorporation	d Name and address (including corporate department, if applicable) of person (or persons) with custody of the books and records of the foreign corporation, and the location of such books and records, if different	

Schedule A Stock of the Foreign Corporation

(a) Description of each class of stock	(b) Number of shares issued and outstanding	
	(i) Beginning of annual accounting period	(ii) End of annual accounting period
COMMON	720.	720.

For Paperwork Reduction Act Notice, see instructions.

Form **5471** (Rev. 12-2022)

Form **5472**

(Rev. December 2022)

Department of the Treasury
Internal Revenue Service**Information Return of a 25% Foreign-Owned U.S. Corporation or a Foreign Corporation Engaged in a U.S. Trade or Business**

(Under Sections 6038A and 6038C of the Internal Revenue Code)

Go to www.irs.gov/Form5472 for instructions and the latest information.For tax year of the reporting corporation beginning 01/01/2022, and ending 12/31/2022**Note:** Enter all information in English and money items in U.S. dollars.

OMB No. 1545-0123

Part I Reporting Corporation (see instructions). All reporting corporations must complete Part I.

1a Name of reporting corporation <u>Global Benefits Group Inc</u> Number, street, and room or suite no. (If a P.O. box, see instructions.) <u>27051 Towne Centre Drive, #210</u> City or town, state, and ZIP code (If a foreign address, see instructions.) <u>FOOTHILL RANCH, CA 92610</u>		1b Employer identification number <u>20-3842750</u>	
		1c Total assets \$ <u>55,844,485.</u>	
1d Principal business activity <u>BROKER</u>		1e Principal business activity code <u>524210</u>	
1f Total value of gross payments made or received reported on this Form 5472. See instructions. \$ <u>113,619,008.</u>		1g Total number of Forms 5472 filed for the tax year <u>3</u>	
		1h Total value of gross payments made or received reported on all Forms 5472. See instructions. \$ <u>116,664,838.</u>	
1i Check here if this is a consolidated filing of Form 5472 <input checked="" type="checkbox"/> <u>Stmnt 51</u>	1j Check here if this is the initial year for which the U.S. reporting corporation is filing a Form 5472 <input type="checkbox"/>	1k Total number of Parts VIII attached to Form 5472	1l Country of incorporation <u>US</u>
1m Date of incorporation	1n Country(ies) under whose laws the reporting corporation files an income tax return as a resident <u>US</u>	1o Principal country(ies) where business is conducted <u>US</u>	
2 Check here if, at any time during the tax year, any foreign person owned, directly or indirectly, at least 50% of (a) the total voting power of all classes of the stock of the reporting corporation entitled to vote, or (b) the total value of all classes of stock of the reporting corporation <input type="checkbox"/>			
3 Check here if the reporting corporation is a foreign-owned domestic disregarded entity (foreign-owned U.S. DE) treated as a corporation for purposes of section 6038A. See instructions <input type="checkbox"/>			

Part II 25% Foreign Shareholder (see instructions)Check here if any direct (or ultimate indirect) 25% foreign shareholder listed in Part II is a surrogate foreign corporation under section 7874(a)(2)(B). ☐

4a Name and address of direct 25% foreign shareholder <u>GBG Insurance LIMITED</u> <u>LEVEL 5, MILL CT LA CHAROTERRIE ST PETER PORT, GK GY1 1LF</u>		
4b(1) U.S. identifying number, if any <u>98-1289938</u>	4b(2) Reference ID number (see instructions)	4b(3) Foreign taxpayer identification number (FTIN), if any (see instructions)
4c Principal country(ies) where business is conducted <u>GK</u>	4d Country of citizenship, organization, or incorporation <u>GK</u>	4e Country(ies) under whose laws the direct 25% foreign shareholder files an income tax return as a resident <u>GK</u>
5a Name and address of direct 25% foreign shareholder		
5b(1) U.S. identifying number, if any	5b(2) Reference ID number (see instructions)	5b(3) FTIN, if any (see instructions)
5c Principal country(ies) where business is conducted	5d Country of citizenship, organization, or incorporation	5e Country(ies) under whose laws the direct 25% foreign shareholder files an income tax return as a resident
6a Name and address of ultimate indirect 25% foreign shareholder <u>GBGI LIMITED</u> <u>LEVEL 5, MILL CT LA CHAROTERRIE ST PETER PORT, GK GY1 1LF</u>		
6b(1) U.S. identifying number, if any <u>98-1289939</u>	6b(2) Reference ID number (see instructions) <u>0000001</u>	6b(3) FTIN, if any (see instructions)
6c Principal country(ies) where business is conducted <u>GK</u>	6d Country of citizenship, organization, or incorporation <u>GK</u>	6e Country(ies) under whose laws the ultimate indirect 25% foreign shareholder files an income tax return as a resident <u>GK</u>
7a Name and address of ultimate indirect 25% foreign shareholder		
7b(1) U.S. identifying number, if any	7b(2) Reference ID number (see instructions)	7b(3) FTIN, if any (see instructions)
7c Principal country(ies) where business is conducted	7d Country of citizenship, organization, or incorporation	7e Country(ies) under whose laws the ultimate indirect 25% foreign shareholder files an income tax return as a resident

For Paperwork Reduction Act Notice, see instructions.

Form **5472** (Rev. 12-2022)

JSA

2C2820 1.000

0001WA X45R

Part III Related Party (see instructions). All reporting corporations must complete this question and the rest of Part III.
Check applicable box: Is the related party a ☒ foreign person or ☐ U.S. person?

8a Name and address of related party GBG Insurance Limited LEVEL 5 MILL CT. LA CHARROTIERE ST PETER PORT, GK GY1 1LF		
8b(1) U.S. identifying number, if any FOREIGNUS	8b(2) Reference ID number (see instructions) 51EJ	8b(3) FTIN, if any (see instructions)
8c Principal business activity INSURANCE		8d Principal business activity code 524140
8e Relationship - Check boxes that apply: <input type="checkbox"/> Related to reporting corporation <input type="checkbox"/> Related to 25% foreign shareholder <input checked="" type="checkbox"/> 25% foreign shareholder		
8f Principal country(ies) where business is conducted GK	8g Country(ies) under whose laws the related party files an income tax return as a resident GK	

Part IV Monetary Transactions Between Reporting Corporations and Foreign Related Party (see instructions)

Caution: Part IV must be completed if the "foreign person" box is checked in the heading for Part III.

If estimates are used, check here. ☐

See Statement 52

9 Sales of stock in trade (inventory)	9	
10 Sales of tangible property other than stock in trade	10	
11 Platform contribution transaction payments received	11	
12 Cost sharing transaction payments received	12	
13a Rents received (for other than intangible property rights)	13a	
b Royalties received (for other than intangible property rights)	13b	
14 Sales, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)	14	
15 Consideration received for technical, managerial, engineering, construction, scientific, or like services	15	
16 Commissions received	16	
17 Amounts borrowed (see instructions) a Beginning balance 178,061,303. b Ending balance or monthly average	17b	76,295,785.
18 Interest received	18	
19 Premiums received for insurance or reinsurance	19	
20 Loan guarantee fees received	20	
21 Other amounts received (see instructions)	21	
22 Total. Combine amounts on lines 9 through 21	22	76,295,785.
23 Purchases of stock in trade (inventory)	23	
24 Purchases of tangible property other than stock in trade	24	
25 Platform contribution transaction payments paid	25	
26 Cost sharing transaction payments paid	26	
27a Rents paid (for other than intangible property rights)	27a	
b Royalties paid (for other than intangible property rights)	27b	
28 Purchases, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)	28	
29 Consideration paid for technical, managerial, engineering, construction, scientific, or like services	29	
30 Commissions paid	30	32,181,790.
31 Amounts loaned (see instructions) a Beginning balance b Ending balance or monthly average	31b	
32 Interest paid	32	
33 Premiums paid for insurance or reinsurance	33	
34 Loan guarantee fees paid	34	
35 Other amounts paid (see instructions) See Statement 52	35	5,141,433.
36 Total. Combine amounts on lines 23 through 35	36	37,323,223.

Part V Reportable Transactions of a Reporting Corporation That Is a Foreign-Owned U.S. DE (see instructions)

Describe on an attached separate sheet any other transaction as defined by Regulations section 1.482-1(i)(7), such as amounts paid or received in connection with the formation, dissolution, acquisition, and disposition of the entity, including contributions to and distributions from the entity, and check here. ☐

Part VI Nonmonetary and Less-Than-Full Consideration Transactions Between the Reporting Corporation and the Foreign Related Party (see instructions)

Describe these transactions on an attached separate sheet and check here. ☐

Form 5472 (Rev. 12-2022)

Part VII Additional Information. All reporting corporations must complete Part VII.

- 37 Does the reporting corporation import goods from a foreign related party? ☐ Yes ☒ No
- 38a If "Yes," is the basis or inventory cost of the goods valued at greater than the customs value of the imported goods? ☐ Yes ☐ No
- b If "Yes," attach a statement explaining the reason or reasons for such difference.
- c If the answers to questions 37 and 38a are "Yes," were the documents used to support this treatment of the imported goods in existence and available in the United States at the time of filing Form 5472? ☐ Yes ☐ No
- 39 During the tax year, was the foreign parent corporation a participant in any cost sharing arrangement (CSA)? ☐ Yes ☒ No
- 40a During the tax year, did the reporting corporation pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? See instructions ☐ Yes ☒ No
- b If "Yes," enter the total amount of the disallowed deductions \$ _____
- 41a Is the reporting corporation claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any transactions with the foreign corporation? If "Yes," complete lines 41b, 41c, and 41d. See instructions. ☐ Yes ☒ No
- b Enter the amount of gross receipts derived from all sales of general property to the foreign related party that the reporting corporation included in its computation of foreign-derived deduction eligible income (FDDEI). See instructions \$ _____
- c Enter the amount of gross receipts derived from all sales of intangible property to the foreign related party that the reporting corporation included in its computation of FDDEI. See instructions \$ _____
- d Enter the amount of gross receipts derived from all services provided to the foreign related party that the reporting corporation included in its computation of FDDEI. See instructions \$ _____
- 42 Did the reporting corporation have any loan to or from the related party, to which the safe-haven rate rules of Regulations section 1.482-2(a)(2)(iii)(B) are applicable, and for which the reporting corporation used a rate of interest within the safe-haven range of Regulations section 1.482-2(a)(2)(iii)(B)(1) (100% to 130% of the AFR for the relevant term)? ☐ Yes ☒ No
- 43a Did the reporting corporation make at least one distribution or acquisition (as defined by Regulations section 1.385-3) during the tax year or, during the period beginning 36 months before the date of the respective acquisition or distribution and ending 36 months afterward, did the reporting corporation issue or refinance indebtedness owed to a related party? ☐ Yes ☒ No
- b If the answer to question 43a is "Yes," provide the following.
- (1) The amount of such distribution(s) and acquisition(s) \$ _____
- (2) The amount of such related party indebtedness \$ _____

Part VIII Cost Sharing Arrangement (CSA)

Note: Complete a separate Part VIII for each CSA in which the reporting corporation was a participant during the tax year. Report all amounts in U.S. dollars. (See instructions.)

- 44 Provide a brief description of the CSA with respect to which this Part VIII is being completed.
- _____
- _____
- _____
- 45 During the course of the tax year, did the reporting corporation become a participant in the CSA? ☐ Yes ☐ No
- 46 Was the CSA in effect before January 5, 2009? ☐ Yes ☐ No
- 47 What was the reporting corporation's share of reasonably anticipated benefits for the CSA? _____ %
- 48a Enter the total amount of stock-based compensation deductions claimed by the reporting corporation \$ _____
- b Enter the total amount of deductions for the tax year for stock-based compensation that was granted during the term of the CSA and, at date of grant, is directly identified with, or reasonably allocable to, the intangible development activity under the CSA \$ _____
- c Was there any stock-based compensation granted during the term of the CSA to individuals who performed functions in business activities that generate cost shared intangibles that was not treated as directly identified with, or reasonably allocable to, the intangible development activity? ☐ Yes ☐ No
- 49a Enter the total amount of intangible development costs for the CSA \$ _____
- b Enter the amount of intangible development costs allocable to the reporting corporation based on the reporting corporation's reasonably anticipated benefits share \$ _____

Part IX Base Erosion Payments and Base Erosion Tax Benefits Under Section 59A (see instructions)

- 50 Amounts defined as base erosion payments under section 59A(d) \$ _____
- 51 Amount of base erosion tax benefits under section 59A(c)(2) \$ _____
- 52 Amount of total qualified derivative payments as described in section 59A(h) made by the reporting corporation \$ _____
- 53 Reserved for future use ☐ _____

Form 5472 (Rev. 12-2022)

Form **5472**

(Rev. December 2022)

Department of the Treasury
Internal Revenue Service**Information Return of a 25% Foreign-Owned U.S. Corporation or a Foreign Corporation Engaged in a U.S. Trade or Business**
(Under Sections 6038A and 6038C of the Internal Revenue Code)Go to www.irs.gov/Form5472 for instructions and the latest information.For tax year of the reporting corporation beginning 01/01/2022, and ending 12/31/2022**Note:** Enter all information in English and money items in U.S. dollars.

OMB No. 1545-0123

Part I Reporting Corporation (see instructions). All reporting corporations must complete Part I.

1a Name of reporting corporation <u>Global Benefits Group Inc</u> Number, street, and room or suite no. (If a P.O. box, see instructions.) <u>27051 Towne Centre Drive, #210</u> City or town, state, and ZIP code (If a foreign address, see instructions.) <u>FOOTHILL RANCH, CA 92610</u>		1b Employer identification number <u>20-3842750</u>	
1d Principal business activity <u>BROKER</u>		1e Principal business activity code <u>524210</u>	
1f Total value of gross payments made or received reported on this Form 5472. See instructions. \$ <u>147,277.</u>		1g Total number of Forms 5472 filed for the tax year <u>3</u>	
1h Total value of gross payments made or received reported on all Forms 5472. See instructions. \$ <u>116,664,838.</u>		1i Country of incorporation <u>US</u>	
1j Check here if this is a consolidated filing of Form 5472 <input checked="" type="checkbox"/> <u>Stmt 53</u>	1k Check here if this is the initial year for which the U.S. reporting corporation is filing a Form 5472 <input type="checkbox"/>	1l Total number of Parts VIII attached to Form 5472	
1m Date of incorporation	1n Country(ies) under whose laws the reporting corporation files an income tax return as a resident <u>US</u>	1o Principal country(ies) where business is conducted <u>US</u>	
2 Check here if, at any time during the tax year, any foreign person owned, directly or indirectly, at least 50% of (a) the total voting power of all classes of the stock of the reporting corporation entitled to vote, or (b) the total value of all classes of stock of the reporting corporation <input type="checkbox"/>			
3 Check here if the reporting corporation is a foreign-owned domestic disregarded entity (foreign-owned U.S. DE) treated as a corporation for purposes of section 6038A. See instructions <input type="checkbox"/>			

Part II 25% Foreign Shareholder (see instructions)Check here if any direct (or ultimate indirect) 25% foreign shareholder listed in Part II is a surrogate foreign corporation under section 7874(a)(2)(B). ☐

4a Name and address of direct 25% foreign shareholder <u>GBG INSURANCE LIMITED</u> <u>LEVEL 5, MILL CT LA CHAROTERRIE ST PETER PORT, GK GY1-1LF</u>		
4b(1) U.S. identifying number, if any <u>98-1289938</u>	4b(2) Reference ID number (see instructions)	4b(3) Foreign taxpayer identification number (FTIN), if any (see instructions)
4c Principal country(ies) where business is conducted <u>GK</u>	4d Country of citizenship, organization, or incorporation <u>GK</u>	4e Country(ies) under whose laws the direct 25% foreign shareholder files an income tax return as a resident <u>GK</u>
5a Name and address of direct 25% foreign shareholder		
5b(1) U.S. identifying number, if any	5b(2) Reference ID number (see instructions)	5b(3) FTIN, if any (see instructions)
5c Principal country(ies) where business is conducted	5d Country of citizenship, organization, or incorporation	5e Country(ies) under whose laws the direct 25% foreign shareholder files an income tax return as a resident
6a Name and address of ultimate indirect 25% foreign shareholder <u>GBGI LIMITED</u> <u>LEVEL 5, MILL CT LA CHAROTERRIE ST PETER PORT, GK GY1 1LF</u>		
6b(1) U.S. identifying number, if any <u>98-1289939</u>	6b(2) Reference ID number (see instructions) <u>0000001</u>	6b(3) FTIN, if any (see instructions)
6c Principal country(ies) where business is conducted <u>GK</u>	6d Country of citizenship, organization, or incorporation <u>GK</u>	6e Country(ies) under whose laws the ultimate indirect 25% foreign shareholder files an income tax return as a resident <u>GK</u>
7a Name and address of ultimate indirect 25% foreign shareholder		
7b(1) U.S. identifying number, if any	7b(2) Reference ID number (see instructions)	7b(3) FTIN, if any (see instructions)
7c Principal country(ies) where business is conducted	7d Country of citizenship, organization, or incorporation	7e Country(ies) under whose laws the ultimate indirect 25% foreign shareholder files an income tax return as a resident

For Paperwork Reduction Act Notice, see instructions.

Form **5472** (Rev. 12-2022)

JSA

2C2820 1.000

0001WA X45R

Part III Related Party (see instructions). All reporting corporations must complete this question and the rest of Part III.
Check applicable box: Is the related party a ☒ foreign person or ☐ U.S. person?

8a Name and address of related party Global Benefits Europe B.V. 1-4 BURY ST. LONDON, UK EC34 5AW		
8b(1) U.S. identifying number, if any FOREIGNUS	8b(2) Reference ID number (see instructions) 14EC345AW	8b(3) FTIN, if any (see instructions)
8c Principal business activity Broker		8d Principal business activity code 524210
8e Relationship - Check boxes that apply: <input type="checkbox"/> Related to reporting corporation <input type="checkbox"/> Related to 25% foreign shareholder <input checked="" type="checkbox"/> 25% foreign shareholder		
8f Principal country(ies) where business is conducted UK	8g Country(ies) under whose laws the related party files an income tax return as a resident UK	

Part IV Monetary Transactions Between Reporting Corporations and Foreign Related Party (see instructions)

Caution: Part IV must be completed if the "foreign person" box is checked in the heading for Part III.

If estimates are used, check here. ☐

See Statement 54

9 Sales of stock in trade (inventory)	9	
10 Sales of tangible property other than stock in trade	10	
11 Platform contribution transaction payments received	11	
12 Cost sharing transaction payments received	12	
13a Rents received (for other than intangible property rights)	13a	
b Royalties received (for other than intangible property rights)	13b	
14 Sales, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)	14	
15 Consideration received for technical, managerial, engineering, construction, scientific, or like services	15	
16 Commissions received	16	
17 Amounts borrowed (see instructions) a Beginning balance NONE b Ending balance or monthly average	17b	147,277.
18 Interest received	18	
19 Premiums received for insurance or reinsurance	19	
20 Loan guarantee fees received	20	
21 Other amounts received (see instructions)	21	
22 Total. Combine amounts on lines 9 through 21	22	147,277.
23 Purchases of stock in trade (inventory)	23	
24 Purchases of tangible property other than stock in trade	24	
25 Platform contribution transaction payments paid	25	
26 Cost sharing transaction payments paid	26	
27a Rents paid (for other than intangible property rights)	27a	
b Royalties paid (for other than intangible property rights)	27b	
28 Purchases, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)	28	
29 Consideration paid for technical, managerial, engineering, construction, scientific, or like services	29	
30 Commissions paid	30	
31 Amounts loaned (see instructions) a Beginning balance 23,618,100. b Ending balance or monthly average	31b	NONE
32 Interest paid	32	
33 Premiums paid for insurance or reinsurance	33	
34 Loan guarantee fees paid	34	
35 Other amounts paid (see instructions)	35	
36 Total. Combine amounts on lines 23 through 35	36	NONE

Part V Reportable Transactions of a Reporting Corporation That Is a Foreign-Owned U.S. DE (see instructions)

Describe on an attached separate sheet any other transaction as defined by Regulations section 1.482-1(i)(7), such as amounts paid or received in connection with the formation, dissolution, acquisition, and disposition of the entity, including contributions to and distributions from the entity, and check here. ☐

Part VI Nonmonetary and Less-Than-Full Consideration Transactions Between the Reporting Corporation and the Foreign Related Party (see instructions)

Describe these transactions on an attached separate sheet and check here. ☐

Part VII Additional Information. All reporting corporations must complete Part VII.

- 37 Does the reporting corporation import goods from a foreign related party? ☐ Yes ☒ No
- 38a If "Yes," is the basis or inventory cost of the goods valued at greater than the customs value of the imported goods? ☐ Yes ☐ No
- b If "Yes," attach a statement explaining the reason or reasons for such difference.
- c If the answers to questions 37 and 38a are "Yes," were the documents used to support this treatment of the imported goods in existence and available in the United States at the time of filing Form 5472? ☐ Yes ☐ No
- 39 During the tax year, was the foreign parent corporation a participant in any cost sharing arrangement (CSA)? ☐ Yes ☒ No
- 40a During the tax year, did the reporting corporation pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? See instructions ☐ Yes ☒ No
- b If "Yes," enter the total amount of the disallowed deductions \$ _____
- 41a Is the reporting corporation claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any transactions with the foreign corporation? If "Yes," complete lines 41b, 41c, and 41d. See instructions. ☐ Yes ☒ No
- b Enter the amount of gross receipts derived from all sales of general property to the foreign related party that the reporting corporation included in its computation of foreign-derived deduction eligible income (FDDEI). See instructions \$ _____
- c Enter the amount of gross receipts derived from all sales of intangible property to the foreign related party that the reporting corporation included in its computation of FDDEI. See instructions \$ _____
- d Enter the amount of gross receipts derived from all services provided to the foreign related party that the reporting corporation included in its computation of FDDEI. See instructions \$ _____
- 42 Did the reporting corporation have any loan to or from the related party, to which the safe-haven rate rules of Regulations section 1.482-2(a)(2)(iii)(B) are applicable, and for which the reporting corporation used a rate of interest within the safe-haven range of Regulations section 1.482-2(a)(2)(iii)(B)(1) (100% to 130% of the AFR for the relevant term)? ☐ Yes ☒ No
- 43a Did the reporting corporation make at least one distribution or acquisition (as defined by Regulations section 1.385-3) during the tax year or, during the period beginning 36 months before the date of the respective acquisition or distribution and ending 36 months afterward, did the reporting corporation issue or refinance indebtedness owed to a related party? ☐ Yes ☒ No
- b If the answer to question 43a is "Yes," provide the following.
- (1) The amount of such distribution(s) and acquisition(s) \$ _____
- (2) The amount of such related party indebtedness \$ _____

Part VIII Cost Sharing Arrangement (CSA)

Note: Complete a separate Part VIII for each CSA in which the reporting corporation was a participant during the tax year. Report all amounts in U.S. dollars. (See instructions.)

- 44 Provide a brief description of the CSA with respect to which this Part VIII is being completed.
- _____
- _____
- _____
- 45 During the course of the tax year, did the reporting corporation become a participant in the CSA? ☐ Yes ☐ No
- 46 Was the CSA in effect before January 5, 2009? ☐ Yes ☐ No
- 47 What was the reporting corporation's share of reasonably anticipated benefits for the CSA? _____ %
- 48a Enter the total amount of stock-based compensation deductions claimed by the reporting corporation \$ _____
- b Enter the total amount of deductions for the tax year for stock-based compensation that was granted during the term of the CSA and, at date of grant, is directly identified with, or reasonably allocable to, the intangible development activity under the CSA \$ _____
- c Was there any stock-based compensation granted during the term of the CSA to individuals who performed functions in business activities that generate cost shared intangibles that was not treated as directly identified with, or reasonably allocable to, the intangible development activity? ☐ Yes ☐ No
- 49a Enter the total amount of intangible development costs for the CSA \$ _____
- b Enter the amount of intangible development costs allocable to the reporting corporation based on the reporting corporation's reasonably anticipated benefits share \$ _____

Part IX Base Erosion Payments and Base Erosion Tax Benefits Under Section 59A (see instructions)

- 50 Amounts defined as base erosion payments under section 59A(d) \$ _____
- 51 Amount of base erosion tax benefits under section 59A(c)(2) \$ _____
- 52 Amount of total qualified derivative payments as described in section 59A(h) made by the reporting corporation \$ _____
- 53 Reserved for future use ☐ _____

Form 5472 (Rev. 12-2022)

Form **5472**

(Rev. December 2022)

Department of the Treasury
Internal Revenue Service**Information Return of a 25% Foreign-Owned U.S. Corporation or a Foreign Corporation Engaged in a U.S. Trade or Business**

(Under Sections 6038A and 6038C of the Internal Revenue Code)

Go to www.irs.gov/Form5472 for instructions and the latest information.For tax year of the reporting corporation beginning 01/01/2022, and ending 12/31/2022**Note:** Enter all information in English and money items in U.S. dollars.

OMB No. 1545-0123

Part I Reporting Corporation (see instructions). All reporting corporations must complete Part I.

1a Name of reporting corporation <u>Global Benefits Group Inc</u> Number, street, and room or suite no. (If a P.O. box, see instructions.)		1b Employer identification number <u>20-3842750</u>	
<u>27051 Towne Centre Drive, #210</u> City or town, state, and ZIP code (If a foreign address, see instructions.)		1c Total assets \$ <u>55,844,485.</u>	
<u>FOOTHILL RANCH, CA 92610</u>			
1d Principal business activity <u>BROKER</u>		1e Principal business activity code <u>524210</u>	
1f Total value of gross payments made or received reported on this Form 5472. See instructions. \$ <u>2,898,553.</u>		1g Total number of Forms 5472 filed for the tax year <u>3</u>	
		1h Total value of gross payments made or received reported on all Forms 5472. See instructions. \$ <u>116,664,838.</u>	
1i Check here if this is a consolidated filing of Form 5472 <input checked="" type="checkbox"/> <u>Stmnt 55</u>	1j Check here if this is the initial year for which the U.S. reporting corporation is filing a Form 5472 <input type="checkbox"/>	1k Total number of Parts VIII attached to Form 5472	1l Country of incorporation <u>US</u>
1m Date of incorporation	1n Country(ies) under whose laws the reporting corporation files an income tax return as a resident <u>US</u>	1o Principal country(ies) where business is conducted <u>US</u>	
2 Check here if, at any time during the tax year, any foreign person owned, directly or indirectly, at least 50% of (a) the total voting power of all classes of the stock of the reporting corporation entitled to vote, or (b) the total value of all classes of stock of the reporting corporation <input type="checkbox"/>			
3 Check here if the reporting corporation is a foreign-owned domestic disregarded entity (foreign-owned U.S. DE) treated as a corporation for purposes of section 6038A. See instructions <input type="checkbox"/>			

Part II 25% Foreign Shareholder (see instructions)Check here if any direct (or ultimate indirect) 25% foreign shareholder listed in Part II is a surrogate foreign corporation under section 7874(a)(2)(B). ☐

4a Name and address of direct 25% foreign shareholder <u>GBG INSURANCE LIMITED</u> <u>LEVEL 5, MILL CT LA CHAROTERRIE ST PETER PORT, GK GY1-1LF</u>		
4b(1) U.S. identifying number, if any <u>98-1289938</u>	4b(2) Reference ID number (see instructions)	4b(3) Foreign taxpayer identification number (FTIN), if any (see instructions)
4c Principal country(ies) where business is conducted <u>GK</u>	4d Country of citizenship, organization, or incorporation <u>GK</u>	4e Country(ies) under whose laws the direct 25% foreign shareholder files an income tax return as a resident <u>GK</u>
5a Name and address of direct 25% foreign shareholder		
5b(1) U.S. identifying number, if any	5b(2) Reference ID number (see instructions)	5b(3) FTIN, if any (see instructions)
5c Principal country(ies) where business is conducted	5d Country of citizenship, organization, or incorporation	5e Country(ies) under whose laws the direct 25% foreign shareholder files an income tax return as a resident
6a Name and address of ultimate indirect 25% foreign shareholder <u>GBGI LIMITED</u> <u>LEVEL 5, MILL CT LA CHAROTERRIE ST PETER PORT, GK GY1 1LP</u>		
6b(1) U.S. identifying number, if any <u>98-1289939</u>	6b(2) Reference ID number (see instructions) <u>0000001</u>	6b(3) FTIN, if any (see instructions)
6c Principal country(ies) where business is conducted <u>GK</u>	6d Country of citizenship, organization, or incorporation <u>GK</u>	6e Country(ies) under whose laws the ultimate indirect 25% foreign shareholder files an income tax return as a resident <u>GK</u>
7a Name and address of ultimate indirect 25% foreign shareholder		
7b(1) U.S. identifying number, if any	7b(2) Reference ID number (see instructions)	7b(3) FTIN, if any (see instructions)
7c Principal country(ies) where business is conducted	7d Country of citizenship, organization, or incorporation	7e Country(ies) under whose laws the ultimate indirect 25% foreign shareholder files an income tax return as a resident

For Paperwork Reduction Act Notice, see instructions.

Form **5472** (Rev. 12-2022)

JSA

2C2820 1.000

0001WA X45R

Part III **Related Party** (see instructions). All reporting corporations must complete this question and the rest of Part III.
Check applicable box: Is the related party a ☒ foreign person or ☐ U.S. person?

8a Name and address of related party GBGI Limited
LEVEL 5, MILL CT LA CHAROTERRIE ST PETER PORT, GK GY1 1LF

8b(1) U.S. identifying number, if any FOREIGNUS
8b(2) Reference ID number (see instructions) 0000001
8b(3) FTIN, if any (see instructions)

8c Principal business activity HOLDING COMPANY
8d Principal business activity code 551112

8e Relationship - Check boxes that apply: ☐ Related to reporting corporation ☐ Related to 25% foreign shareholder ☒ 25% foreign shareholder

8f Principal country(ies) where business is conducted GK
8g Country(ies) under whose laws the related party files an income tax return as a resident GK

Part IV **Monetary Transactions Between Reporting Corporations and Foreign Related Party** (see instructions)
Caution: Part IV must be completed if the "foreign person" box is checked in the heading for Part III.
If estimates are used, check here. ☐ See Statement 56

9	Sales of stock in trade (inventory)	9	
10	Sales of tangible property other than stock in trade	10	
11	Platform contribution transaction payments received	11	
12	Cost sharing transaction payments received	12	
13a	Rents received (for other than intangible property rights)	13a	
b	Royalties received (for other than intangible property rights)	13b	
14	Sales, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)	14	
15	Consideration received for technical, managerial, engineering, construction, scientific, or like services	15	
16	Commissions received	16	
17	Amounts borrowed (see instructions) a Beginning balance b Ending balance or monthly average	17b	
18	Interest received	18	
19	Premiums received for insurance or reinsurance	19	
20	Loan guarantee fees received	20	
21	Other amounts received (see instructions)	21	
22	Total. Combine amounts on lines 9 through 21	22	
23	Purchases of stock in trade (inventory)	23	
24	Purchases of tangible property other than stock in trade	24	
25	Platform contribution transaction payments paid	25	
26	Cost sharing transaction payments paid	26	
27a	Rents paid (for other than intangible property rights)	27a	
b	Royalties paid (for other than intangible property rights)	27b	
28	Purchases, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)	28	
29	Consideration paid for technical, managerial, engineering, construction, scientific, or like services	29	
30	Commissions paid	30	
31	Amounts loaned (see instructions) a Beginning balance b Ending balance or monthly average	31b	2,041,647.
32	Interest paid	32	
33	Premiums paid for insurance or reinsurance	33	
34	Loan guarantee fees paid	34	
35	Other amounts paid (see instructions) See. Statement. 56	35	856,906.
36	Total. Combine amounts on lines 23 through 35	36	2,898,553.

Part V **Reportable Transactions of a Reporting Corporation That Is a Foreign-Owned U.S. DE** (see instructions)
Describe on an attached separate sheet any other transaction as defined by Regulations section 1.482-1(i)(7), such as amounts paid or received in connection with the formation, dissolution, acquisition, and disposition of the entity, including contributions to and distributions from the entity, and check here. ☐

Part VI **Nonmonetary and Less-Than-Full Consideration Transactions Between the Reporting Corporation and the Foreign Related Party** (see instructions)
Describe these transactions on an attached separate sheet and check here. ☐

Part VII Additional Information. All reporting corporations must complete Part VII.

- 37 Does the reporting corporation import goods from a foreign related party? ☐ Yes ☒ No
- 38a If "Yes," is the basis or inventory cost of the goods valued at greater than the customs value of the imported goods? ☐ Yes ☐ No
- b If "Yes," attach a statement explaining the reason or reasons for such difference.
- c If the answers to questions 37 and 38a are "Yes," were the documents used to support this treatment of the imported goods in existence and available in the United States at the time of filing Form 5472? ☐ Yes ☐ No
- 39 During the tax year, was the foreign parent corporation a participant in any cost sharing arrangement (CSA)? ☐ Yes ☒ No
- 40a During the tax year, did the reporting corporation pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? See instructions ☐ Yes ☒ No
- b If "Yes," enter the total amount of the disallowed deductions \$ _____
- 41a Is the reporting corporation claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any transactions with the foreign corporation? If "Yes," complete lines 41b, 41c, and 41d. See instructions. ☐ Yes ☒ No
- b Enter the amount of gross receipts derived from all sales of general property to the foreign related party that the reporting corporation included in its computation of foreign-derived deduction eligible income (FDDEI). See instructions \$ _____
- c Enter the amount of gross receipts derived from all sales of intangible property to the foreign related party that the reporting corporation included in its computation of FDDEI. See instructions \$ _____
- d Enter the amount of gross receipts derived from all services provided to the foreign related party that the reporting corporation included in its computation of FDDEI. See instructions \$ _____
- 42 Did the reporting corporation have any loan to or from the related party, to which the safe-haven rate rules of Regulations section 1.482-2(a)(2)(iii)(B) are applicable, and for which the reporting corporation used a rate of interest within the safe-haven range of Regulations section 1.482-2(a)(2)(iii)(B)(1) (100% to 130% of the AFR for the relevant term)? ☐ Yes ☒ No
- 43a Did the reporting corporation make at least one distribution or acquisition (as defined by Regulations section 1.385-3) during the tax year or, during the period beginning 36 months before the date of the respective acquisition or distribution and ending 36 months afterward, did the reporting corporation issue or refinance indebtedness owed to a related party? ☐ Yes ☒ No
- b If the answer to question 43a is "Yes," provide the following.
- (1) The amount of such distribution(s) and acquisition(s) \$ _____
- (2) The amount of such related party indebtedness \$ _____

Part VIII Cost Sharing Arrangement (CSA)

Note: Complete a separate Part VIII for each CSA in which the reporting corporation was a participant during the tax year. Report all amounts in U.S. dollars. (See instructions.)

- 44 Provide a brief description of the CSA with respect to which this Part VIII is being completed.
- _____
- _____
- _____
- 45 During the course of the tax year, did the reporting corporation become a participant in the CSA? ☐ Yes ☐ No
- 46 Was the CSA in effect before January 5, 2009? ☐ Yes ☐ No
- 47 What was the reporting corporation's share of reasonably anticipated benefits for the CSA? _____ %
- 48a Enter the total amount of stock-based compensation deductions claimed by the reporting corporation \$ _____
- b Enter the total amount of deductions for the tax year for stock-based compensation that was granted during the term of the CSA and, at date of grant, is directly identified with, or reasonably allocable to, the intangible development activity under the CSA \$ _____
- c Was there any stock-based compensation granted during the term of the CSA to individuals who performed functions in business activities that generate cost shared intangibles that was not treated as directly identified with, or reasonably allocable to, the intangible development activity? ☐ Yes ☐ No
- 49a Enter the total amount of intangible development costs for the CSA \$ _____
- b Enter the amount of intangible development costs allocable to the reporting corporation based on the reporting corporation's reasonably anticipated benefits share \$ _____

Part IX Base Erosion Payments and Base Erosion Tax Benefits Under Section 59A (see instructions)

- 50 Amounts defined as base erosion payments under section 59A(d) \$ _____
- 51 Amount of base erosion tax benefits under section 59A(c)(2) \$ _____
- 52 Amount of total qualified derivative payments as described in section 59A(h) made by the reporting corporation \$ _____
- 53 Reserved for future use ☐ _____

Form 5472 (Rev. 12-2022)

Form **8992**(Rev. December 2022)
Department of the Treasury
Internal Revenue Service**U.S. Shareholder Calculation of Global Intangible
Low-Taxed Income (GILTI)**Go to www.irs.gov/Form8992 for instructions and the latest information.

OMB No. 1545-0123

Attachment
Sequence No. **992**

Name of person filing this return

Global Benefits Group Inc and Subs

A Identifying number

20-3842750

Name of U.S. shareholder

B Identifying number

Part I Net Controlled Foreign Corporation (CFC) Tested Income

1	Sum of Pro Rata Share of Net Tested Income If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (e). If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (c), that pertains to the U.S. shareholder.	1	852,451.
2	Sum of Pro Rata Share of Net Tested Loss If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (f). If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (f), that pertains to the U.S. shareholder.	2	(495,251.)
3	Net CFC Tested Income. Combine lines 1 and 2. If zero or less, stop here.	3	357,200.

Part II Calculation of Global Intangible Low-Taxed Income (GILTI)

1	Net CFC Tested Income. Enter amount from Part I, line 3	1	357,200.
2	Deemed Tangible Income Return (DTIR) If the U.S. shareholder is not a member of a U.S. consolidated group, multiply the total from Schedule A (Form 8992), line 1, column (g), by 10% (0.10). If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (i), that pertains to the U.S. shareholder.	2	
3a	Sum of Pro Rata Share of Tested Interest Expense If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (j). If the U.S. shareholder is a member of a U.S. consolidated group, leave line 3a blank.	3a	
b	Sum of Pro Rata Share of Tested Interest Income If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (i). If the U.S. shareholder is a member of a U.S. consolidated group, leave line 3b blank.	3b	
c	Specified Interest Expense If the U.S. shareholder is not a member of a U.S. consolidated group, subtract line 3b from line 3a. If zero or less, enter -0-. If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (m), that pertains to the U.S. shareholder.	3c	NONE
4	Net DTIR. Subtract line 3c from line 2. If zero or less, enter -0-	4	
5	GILTI. Subtract line 4 from line 1. If zero or less, enter -0-	5	357,200.

For Paperwork Reduction Act Notice, see separate instructions.

Form **8992** (Rev. 12-2022)

SCHEDULE B
(Form 8992)
(Rev. December 2022)
Department of the Treasury
Internal Revenue Service

Calculation of Global Intangible Low-Taxed Income (GILTI) for Members of a U.S. Consolidated Group Who Are U.S. Shareholders of a CFC

OMB No. 1545-0123

Go to www.irs.gov/Form8992 for instructions and the latest information.

Important: See instructions before completing this Schedule B.

Name of U.S. parent corporation

Employer identification number

Global Benefits Group Inc

20-3842750

Part I CFC-Level Reporting of Amounts From Schedule I-1 (Form 5471) and U.S. Shareholder-Level Reporting of CFC Items

(a) Name of CFC	(b) EIN or Reference ID	(c) Name of U.S. Shareholder	(d) EIN	(e) Tested Income	(f) Tested Loss	(g) Pro Rata Share of Tested Income	(h) Pro Rata Share of Tested Loss
SHANGHAI (GBG) ENTERPRISE MANAGEMENT C		Global Benefits Group Inc	20-3842750		()		()
GBG SERVICES (INDIA) PRIVATE LIMITED		Global Benefits Group Inc	20-3842750	105,270.	()		()
GLOBAL BENEFITS GROUP CANADA LTD.	98-1016850	Global Benefits Group Inc	20-3842750		(78,962.)		()
GLOBAL BENEFITS GROUP PROCESSING PHIL		Global Benefits Group Inc	20-3842750	104,105.	()		()
GLOBAL BENEFITS GROUP (UK) LIMITED		Global Benefits Group Inc	20-3842750		(416,288.)		()
GBG ELITE MEDICAL SERVICES, S.A. DE C		Global Benefits Group Inc	20-3842750	164,623.	()		()
GBG PREMIER, S.A.DE.C.V (MEXICO)		Global Benefits Group Inc	20-3842750		()		()
GBG PARAGUAY SOCIEDAD ANONIMA		Global Benefits Group Inc	20-3842750		()		()
					()		()
					()		()
					()		()
					()		()
					()		()
					()		()
					()		()
					()		()
1. Totals (see instructions)				373,998.	(495,250.)		()

Important: See **Computer-Generated Schedule B** in the Instructions for Form 8992.

For Paperwork Reduction Act Notice, see the Instructions for Form 8992.

Schedule B (Form 8992) (Rev. 12-2022)

Part I CFC-Level Reporting of Amounts From Schedule I-1 (Form 5471) and U.S. Shareholder-Level Reporting of CFC Items (continued)

	(i) Pro Rata Share of QBAI	(j) Pro Rata Share of Tested Loss QBAI Amount	(k) Tested Interest Expense	(l) Pro Rata Share of Tested Interest Expense	(m) Tested Interest Income	(n) Pro Rata Share of Tested Interest Income	GILTI Allocated to Tested Income CFCs (see instructions)	
							(o) GILTI Allocation Ratio (see instructions)	(p) GILTI Allocated to Tested Income CFCs (see instructions)
		()						NONE
		()			1,526.			NONE
		()						NONE
		()			137.			NONE
		()						NONE
		()						NONE
		()						NONE
		()						NONE
		()						
		()						
		()						
		()						
		()						
		()						
		()						
1. Totals (see instructions)		()			1,663.			NONE

Schedule B (Form 8992) (Rev. 12-2022)

Part II	U.S. Shareholder-Level Calculations
----------------	--

2. Totals (see instructions)	852,451.	1.0000	(495,251.)	(495,251.)
------------------------------	----------	--------	-------------	-------------

Schedule B (Form 8992) (Rev. 12-2022)

Part II U.S. Shareholder-Level Calculations *(continued)*

	(g) Consolidated QBAI	(h) Allocable Share of Consolidated QBAI	(i) Deemed Tangible Income Return (DTIR)	(j) Consolidated Tested Interest Expense	(k) Consolidated Tested Interest Income	(l) Consolidated Specified Interest Expense	(m) Allocable Share of Consolidated Specified Interest Expense
							NONE
2. Totals (see instructions)							NONE

Form **8916-A****Supplemental Attachment to Schedule M-3**(Rev. November 2019)
Department of the Treasury
Internal Revenue Service▶ **Attach to Schedule M-3 for Form 1065, 1120, 1120-L, 1120-PC, or 1120-S.**
▶ **Go to www.irs.gov/Form1120 for the latest information.**

OMB No. 1545-0123

Name of common parent
Global Benefits Group IncEmployer identification number
20-3842750

Name of subsidiary

Employer identification number

Part I Cost of Goods Sold

Cost of Goods Sold Items	(a) Expense per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Deduction per Tax Return
1 Amounts attributable to cost flow assumptions				
2 Amounts attributable to:				
a Stock option expense				
b Other equity-based compensation				
c Meals and entertainment				
d Parachute payments				
e Compensation with section 162(m) limitation				
f Pension and profit sharing				
g Other post-retirement benefits				
h Deferred compensation				
i Reserved				
j Amortization				
k Depletion				
l Depreciation				
m Corporate-owned life insurance premiums				
n Other section 263A costs				
3 Inventory shrinkage accruals				
4 Excess inventory and obsolescence reserves				
5 Lower of cost or market write-downs				
6 Other items with differences (attach statement).				
7 Other items with no differences				
8 Total cost of goods sold. Add lines 1 through 7 in columns a, b, c, and d. Enter totals on the applicable Schedule M-3. See instructions				

For Paperwork Reduction Act Notice, see instructions.

Form **8916-A** (Rev. 11-2019)

Part II Interest Income

	Interest Income Item	(a) Income (Loss) per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Income (Loss) per Tax Return
1	Tax-exempt interest income				
2	Interest income from hybrid securities				
3	Sale/lease interest income				
4a	Intercompany interest income - From outside tax affiliated group				
4b	Intercompany interest income - From tax affiliated group				
5	Other interest income				
6	Total interest income. Add lines 1 through 5 in columns a, b, c, and d. Enter total on the applicable Schedule M-3. See instructions.				

Part III Interest Expense

	Interest Expense Item	(a) Expense per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Deduction per Tax Return
1	Interest expense from hybrid securities				
2	Lease/purchase interest expense				
3a	Intercompany interest expense - Paid to outside tax affiliated group				
3b	Intercompany interest expense - Paid to tax affiliated group				
4	Other interest expense	Stmt 58 180,082.			180,082.
5	Total interest expense. Add lines 1 through 4 in columns a, b, c, and d. Enter total on the applicable Schedule M-3. See instructions.	180,082.			180,082.

Form **8916-A** (Rev. 11-2019)

Form **8916-A****Supplemental Attachment to Schedule M-3**(Rev. November 2019)
Department of the Treasury
Internal Revenue Service▶ **Attach to Schedule M-3 for Form 1065, 1120, 1120-L, 1120-PC, or 1120-S.**
▶ **Go to www.irs.gov/Form1120 for the latest information.**

OMB No. 1545-0123

Name of common parent
Global Benefits Group IncEmployer identification number
20-3842750Name of subsidiary
GBG Assist, Inc.Employer identification number
37-1797452**Part I Cost of Goods Sold**

Cost of Goods Sold Items	(a) Expense per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Deduction per Tax Return
1 Amounts attributable to cost flow assumptions				
2 Amounts attributable to:				
a Stock option expense				
b Other equity-based compensation				
c Meals and entertainment				
d Parachute payments				
e Compensation with section 162(m) limitation				
f Pension and profit sharing				
g Other post-retirement benefits				
h Deferred compensation				
i Reserved				
j Amortization				
k Depletion				
l Depreciation				
m Corporate-owned life insurance premiums				
n Other section 263A costs				
3 Inventory shrinkage accruals				
4 Excess inventory and obsolescence reserves				
5 Lower of cost or market write-downs				
6 Other items with differences (attach statement).				
7 Other items with no differences				
8 Total cost of goods sold. Add lines 1 through 7 in columns a, b, c, and d. Enter totals on the applicable Schedule M-3. See instructions				

For Paperwork Reduction Act Notice, see instructions.

Form **8916-A** (Rev. 11-2019)

Part II Interest Income

	Interest Income Item	(a) Income (Loss) per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Income (Loss) per Tax Return
1	Tax-exempt interest income				
2	Interest income from hybrid securities				
3	Sale/lease interest income				
4a	Intercompany interest income - From outside tax affiliated group				
4b	Intercompany interest income - From tax affiliated group				
5	Other interest income				
6	Total interest income. Add lines 1 through 5 in columns a, b, c, and d. Enter total on the applicable Schedule M-3. See instructions.				

Part III Interest Expense

	Interest Expense Item	(a) Expense per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Deduction per Tax Return
1	Interest expense from hybrid securities				
2	Lease/purchase interest expense				
3a	Intercompany interest expense - Paid to outside tax affiliated group				
3b	Intercompany interest expense - Paid to tax affiliated group				
4	Other interest expense	180,082.			180,082.
5	Total interest expense. Add lines 1 through 4 in columns a, b, c, and d. Enter total on the applicable Schedule M-3. See instructions.	180,082.			180,082.

Form **8916-A** (Rev. 11-2019)

2022 Depreciation

Description of Property															
General Depreciation and Amortization															
Asset description	Date placed in service	Unadjusted cost or basis	Bus. %	179 exp. reduc. in basis	Basis Reduction	Basis for depreciation	Beginning Accumulated Depreciation	Ending Accumulated Depreciation	Method	Convention	Life	ACRS class	MA CRS class	Current -yr 179 expense	Current-year depreciation
2-FYE June Equip	01/01/2017	94,553.	100.		47,277.	47,276.	41,137.	46,928.	150 DB	HY			7		5,791.
3-FYE June 2017 Equi	01/01/2017	23,709.	100.		11,855.	11,854.	10,314.	11,766.	150 DB	HY			7		1,452.
4-FYE June 2017 F&F	01/01/2017	36,462.	100.		18,231.	18,231.	15,863.	18,096.	150 DB	HY			7		2,233.
21-FYE June 2014 F&F	12/31/2013	112,931.	100.		56,466.	56,465.	54,887.	54,887.	150 DB	HY			7		
22-FYE June 2014 Equ	01/01/2014	82,773.	100.		41,837.	40,936.	40,936.	40,936.	150 DB	HY			7		
23-FYE June 2014 F&F	01/01/2014	40,627.	100.		20,314.	20,313.	20,313.	20,313.	150 DB	HY			7		
24-FYE June 2015 F&F	01/01/2015	74,503.	100.		37,252.	37,251.	37,251.	37,251.	150 DB	HY			7		
25-FYE June 2016 F&F	01/01/2016	27,722.	100.		13,861.	13,861.	13,545.	13,861.	150 DB	HY			7		316.
26-FYE LHI	02/02/2015	43,343.	100.			43,343.	7,641.	8,752.	S/L	MM			39		1,111.
27-FYE June 2016 LHI	01/01/2016	126,756.	100.			126,756.	19,365.	22,615.	S/L	MM			39		3,250.
37-FYE June 2014 Equ	12/31/2013	16,625.	100.		8,313.	8,312.	8,080.	8,080.	150 DB	HY			7		
38-FYE June 2015 Equ	12/31/2014	13,500.	100.		6,750.	6,750.	6,750.	6,750.	150 DB	HY			7		
39-FYE June 2015 Equ	01/01/2015	60,729.	100.		30,365.	30,364.	30,364.	30,364.	150 DB	HY			7		
40-FYE June 2016 Equ	01/01/2016	371,366.	100.		185,683.	185,683.	181,460.	185,683.	150 DB	HY			7		4,223.
89-Miami LHI	01/17/2018	22,520.	100.			22,520.	2,285.	2,862.	S/L	MM			39		577.
90-Miami LHI	06/19/2018	19,863.	100.			19,863.	1,803.	2,312.	S/L	MM			39		509.
57-software	12/31/2017	3,852,158.	100.			3,852,158.	3,852,158.	3,852,158.	S/L	S/L	3.000				
58-software	12/31/2018	115,680.	100.			115,680.	115,680.	115,680.	S/L	S/L	3.000				
137-CDW Direct Vern	12/20/2019	33,800.	100.			33,800.	22,534.	33,800.	S/L	S/L	3.000				11,266.
139-Actisure	04/01/2019	6,311,633.	100.			6,311,633.	5,785,664.	6,311,633.	S/L	S/L	3.000				525,969.
140-Archer 2.0	04/01/2019	395,350.	100.			395,350.	362,404.	395,350.	S/L	S/L	3.000				32,946.
141-Aug-Sept Laptop	09/23/2019	7,456.	100.			7,456.	5,591.	7,456.	S/L	S/L	3.000				1,865.
142-Dell.com	12/20/2019	2,483.	100.			2,483.	1,656.	2,483.	S/L	S/L	3.000				827.
143-Dell.com	12/26/2019	9,185.	100.			9,185.	6,124.	9,185.	S/L	S/L	3.000				3,061.
144-Student Waiver	12/31/2019	15,000.	100.			15,000.	10,000.	15,000.	S/L	S/L	3.000				5,000.
145-Hard Copy ID	12/31/2019	810.	100.			810.	540.	810.	S/L	S/L	3.000				270.
2020 Equipment	01/01/2020	370,145.	100.		370,145.				150 DB	HY			5		
2020 Software	01/01/2020	724,856.	100.		724,856.				S/L	S/L	3.000				
2020 F&F	01/01/2020	73,817.	100.		73,817.				150 DB	HY			7		
2020 LHI	01/2020	17,977.	100.			17,977.	903.	1,364.	S/L	MM			39		461.
2021 FF	01/01/2021	101,988.	100.		101,988.				150 DB	HY			7		
2021 EQ	01/01/2021	2,102.	100.		2,102.				150 DB	HY			5		
2021 SW	01/01/2021	1,252,688.	100.		1,252,688.				S/L	S/L	3.000				
2022 EQ	01/01/2022	13,467.	100.		13,467.				150 DB	HY			5		
2022 FF	01/01/2022	226,924.	100.		226,924.				150 DB	HY			7		
2022 SW	01/01/2022	1,427,842.	100.		1,427,842.				S/L	S/L	3.000				
Less: Retired Assets															
TOTALS															

*Assets Retired

2022 Depreciation

[illegible]

*Assets Retired

2022 Depreciation

Description of Property															
General Depreciation and Amortization - GRAND TOTAL PROPERTY DETAIL															
Asset description	Date placed in service	Unadjusted cost or basis	Bus. %	179 exp. reduc. in basis	Basis Reduction	Basis for depreciation	Beginning Accumulated Depreciation	Ending Accumulated Depreciation	Method	Convention	Life	ACRS class	MACRS class	Current-yr 179 expense	Current-year depreciation
Other Than Listed Property															
Gross		16,134,563.			4,672,033.	11,462,530.	10,666,468.	11,267,595.							601,127.
Less: Retired Assets															
Current Year Special Depreciation Allowance															1,668,233.
Sub Total:		16,134,563.			4,672,033.	11,462,530.	10,666,468.	11,267,595.							2,269,360.
Total Current Year Special Depreciation Allowance															1,668,233.
Gross Amounts		16,134,563.			4,672,033.	11,462,530.	10,666,468.	11,267,595.							601,127.
Less: Retired Assets															
TOTALS		16,134,563.			4,672,033.	11,462,530.	10,666,468.	11,267,595.							2,269,360.

*Assets Retired

2022 Amortization

[illegible]

* Assets Retired

JSA

2C9026 1.000

0001W4 X45R

Global Benefits Group Inc and Subs

	Combined	ELIMINATIONS	Adjustments	Global Benefits Group Inc and Subs
Consolidated Schedules				
1120 Page 1				
1a	Gross receipts or sales	73,302,265.		73,302,265.
1b	Returns and allowances			
1c	Balance	73,302,265.		73,302,265.
2	Cost of goods sold			
3	Gross profit	73,302,265.		73,302,265.
4	Dividends	357,200.		357,200.
5	Interest			
6	Gross rents			
7	Gross royalties			
8	Capital gain net			
9	income			
9	Net gain or (loss)			
	from Form 4797			
10	Other income	14,532,338.		14,532,338.
11	Total income	88,191,803.		88,191,803.
12	Compensation of officers			
13	Salaries and wages	21,367,568.		21,367,568.
14	Repairs and maintenance			
15	Bad debts			
16	Rents	769,386.		769,386.
17	Taxes and licenses	1,430,547.		1,430,547.
18	Interest	180,082.		180,082.
19	Charitable contributions			
20	Depreciation	2,269,360.		2,269,360.
21	Depletion			
22	Advertising	1,593,974.		1,593,974.
23	Pension, profit-sharing etc., plans	1,848,177.		1,848,177.
24	Employee benefit programs	3,214,157.		3,214,157.
25	Reserved for future use			
26	Other deductions	56,760,629.		56,760,629.
27	Total deductions	89,433,880.		89,433,880.
28	Taxable income before NOL & Spec. Deductions	-1,242,077.	NONE	-1,242,077.
29	NOL,Spec. deductions			
30	Taxable income	-1,242,077.	NONE	-1,242,077.
JSA				

Global Benefits Group Inc and Subs

20-3842750

Consolidated Schedules
1120 Page 1

	Global Benefits Group Inc	GBG Administrative Services	GBG Assist, Inc.	International Claims Services, Inc.	GBG Holdings, Inc.	Global Benefits Group, US Inc.
	20-3842750	26-4068764	37-1797452	98-0076650	33-0950280	20-4570749
1a Gross receipts or sales	59,416,806.		13,885,459.			
1b Returns and allowances						
1c Balance	59,416,806.		13,885,459.			
2 Cost of goods sold						
3 Gross profit	59,416,806.		13,885,459.			
4 Dividends	357,200.					
5 Interest						
6 Gross rents						
7 Gross royalties						
8 Capital gain net						
9 Net gain or (loss) income from Form 4797						
10 Other income	12,755,436.	1,565,245.	126,151.	85,506.		
11 Total income	72,529,442.	1,565,245.	14,011,610.	85,506.		
12 Compensation of officers						
13 Salaries and wages	21,182,092.		185,476.			
14 Repairs and maintenance						
15 Bad debts						
16 Rents	769,386.					
17 Taxes and licenses	1,420,823.	1,250.	8,474.			
18 Interest			180,082.			
19 Charitable contributions						
20 Depreciation	2,269,360.					
21 Depletion						
22 Advertising	1,589,631.			4,343.		
23 Pension, profit-sharing etc., plans	1,848,177.					
24 Employee benefit programs	3,201,477.		12,680.			
25 Reserved for future use						
26 Other deductions	49,298,189.	116,745.	6,461,098.	884,597.		
27 Total deductions	81,579,135.	117,995.	6,847,810.	888,940.		
28 Taxable income before NOL & Spec. Deductions	-9,049,693.	1,447,250.	7,163,800.	-803,434.	NONE	NONE
29 NOL,Spec. deductions						
30 Taxable income	-9,049,693.	1,447,250.	7,163,800.	-803,434.	NONE	NONE
JSA						

1120 Page 1 Detail
=====

Line 10 - Other Income
=====

Global Benefits Group Inc

OTHER INCOME	12,755,436.
--------------	-------------

Subtotal	12,755,436.
----------	-------------

GBG Administrative Services

Commission and Fee Income	1,291,138.
---------------------------	------------

Miscellaneous Income	274,107.
----------------------	----------

Subtotal	1,565,245.
----------	------------

GBG Assist, Inc.

Miscellaneous Income	126,151.
----------------------	----------

Subtotal	126,151.
----------	----------

International Claims Services, Inc.

Miscellaneous Income	85,506.
----------------------	---------

Subtotal	85,506.
----------	---------

Total Line 10 - Other Income	14,532,338.
------------------------------	-------------

1120 Page 1 Detail

Line 17 - Taxes Summary

=====	
Taxes (excluding income taxes)	1,385,538.
Other state and local taxes	45,009.

Total Line 17 - Taxes	1,430,547.
=====	

Line 17 - Taxes (excluding income taxes)

=====

Global Benefits Group Inc

Payroll Taxes Expense	1,377,064.

Subtotal	1,377,064.

GBG Assist, Inc.

Payroll Taxes Expense	8,474.

Subtotal	8,474.

Total - Taxes (excluding income taxes)	1,385,538.
=====	

Line 17 - Other state and local taxes

=====

Global Benefits Group Inc

State and Local Taxes	43,759.

Subtotal	43,759.

GBG Administrative Services

Other state and local taxes	1,250.

Subtotal	1,250.

Total - Other state and local taxes	45,009.
=====	

1120 Page 1 Detail

=====

Line 19 - 5 Year contribution carryover

1120 Page 1 Detail

Line 26 - Other Deductions

Global Benefits Group Inc

Amortization	53,224.
Travel Expense	965,199.
Insurance Expense	1,414,714.
Meals and Entertainment Expense	81,342.
Dues and Subscriptions	1,408,414.
Professional Fees Expense	1,922,419.
Licenses and Fees	567,553.
Bank Fees	257,449.
Occupancy Expense	1,001,966.
Postage / Printing	58,105.
Communications Summary	415,215.
Supplies	89,489.
Miscellaneous	614,883.
Direct Costs	34,479,541.
Equipment	1,537,141.
Other Deduction	4,431,535.

Subtotal	49,298,189.
----------	-------------

GBG Administrative Services

Insurance Expense	1,850.
Professional Fees Expense	105,424.
Licenses and Fees	8,740.
Bank Fees	525.
Foreign Exchange Gain/Loss	206.

Subtotal	116,745.
----------	----------

GBG Assist, Inc.

Professional Fees Expense	146,575.
Bank Fees	385.
Network Fees	6,313,534.
Foreign Exchange Gain/Loss	604.

Subtotal	6,461,098.
----------	------------

International Claims Services, Inc.

Other Deductions	321,389.
Bank Fees	202,265.

Continued on next page

Statement 6

1120 Page 1 Detail

Line 26 - Other Deductions (Cont'd)

Foreign Exchange Gain/Loss	360,943.
Subtotal	884,597.
Total Line 26 - Other Deductions	56,760,629.

Combined

ELIMINATIONS

Adjustments

Global Benefits
Group Inc and
Subs

Consolidated Schedules
Sch. C Summary

Dividends				
1	Domestic Corps-subj. to 50% ded			
2	Domestic Corps-subj.to 65% ded			
3	Debt-Financed stock - Dom & Fgn			
4	Pref Stk < 20% owned Pub Util			
5	Pref Stk > = 20% owned Pub Util			
6	<20% Fgn Corps & FSC's-50%			
7	>= 20% Fgn Corps & FSC's-65%			
8	Wholly-owned fgn subs-100%			
9	Total Lines 1-8			
10	Domestic corps-Small Bus Inv			
11	From affiliated group member			
12	From certain FSCs			
13	Foreign-source portion of dividends received from a specified 10%-owned foreign corporations			
14	Other dividends from Foreign corporations			
15	Section 965(a) inclusion			
16a	Subpart F inclusions derived from the sale by controlled foreign corporation (CFC) of the stock a lower-tier foreign corporation treated as a dividend			
16b	Subpart F inclusions derived from hybrid dividends of tiered corporations			
16c	Other inclusions from CFCs under subpart F			
17	Global IntangibleLow-Taxed Income	357,200.		357,200.
18	Gross-up for foreign taxes deemed paid			
19	IC-DISC and former DISC dividends not included above			
20	Other dividends			
23	TOTAL DIVIDENDS	357,200.		357,200.
		=====	=====	=====

	Combined	ELIMINATIONS	Adjustments	Global Benefits Group Inc and Subs
Special Deductions	-----	-----	-----	-----
1 Domestic Corp-subj. to 50% ded				
2 Domestic Corp-subj. to 65% ded				
3 Debt-Financed stock-Dom & Fgn				
4 Pref Stk < 20% owned Pub Util				
5 Pref Stk >= 20% owned Pub Util				
6 < 20% Fgn Corps & FSC's-50%				
7 >= 20% Fgn Corps & FSC's-65%				
8 Wholly-owned fgn subs-100%				
	-----	-----	-----	-----
9 Total Lines 1-8				
10 Domestic corps-Small Bus Inv				
11 From affiliated group member				
12 From certain FSCs				
13 Foreign-source portion of dividends received from a specified 10%- owned foreign corporation				
15 Section 965(a) inclusion				
16a Subpart F inclusions derived from the sale by CFC of the stock a lower-tier foreign corporation treated as a dividend				
21 Dividends paid on certain preferred stock of public utilities				
22 Section 250 deduction				
	-----	-----	-----	-----
24 TOTAL SPECIAL DEDUCTIONS	=====	=====	=====	=====

	Global Benefits Group Inc	GBG Administrative Services	GBG Assist, Inc.	International Claims Services, Inc.	GBG Holdings, Inc.	Global Benefits Group, US Inc.
Consolidated Schedules						
Sch. C Summary	20-3842750	26-4068764	37-1797452	98-0076650	33-0950280	20-4570749
Dividends	-----	-----	-----	-----	-----	-----
1 Domestic Corps-subj. to 50% ded						
2 Domestic Corps-subj.to 65% ded						
3 Debt-Financed stock - Dom & Fgn						
4 Pref Stk < 20% owned Pub Util						
5 Pref Stk > = 20% owned Pub Util						
6 <20% Fgn Corps & FSC's-50%						
7 >= 20% Fgn Corps & FSC's-65%						
8 Wholly-owned fgn subs-100%						
	-----	-----	-----	-----	-----	-----
9 Total Lines 1-8						
10 Domestic corps-Small Bus Inv						
11 From affiliated group member						
12 From certain FSCs						
13 Foreign-source portion of dividends received from a specified 10%-owned foreign corporations						
14 Other dividends from Foreign corporations						
15 Section 965(a) inclusion						
16a Subpart F inclusions derived from the sale by controlled foreign corporation (CFC) of the stock a lower-tier foreign corporation treated as a dividend						
16b Subpart F inclusions derived from hybrid dividends of tiered corporations						
16c Other inclusions from CFCs under subpart F						
17 Global IntangibleLow-Taxed Income	357,200.					
18 Gross-up for foreign taxes deemed paid						
19 IC-DISC and former DISC dividends not included above						
20 Other dividends						
	-----	-----	-----	-----	-----	-----
23 TOTAL DIVIDENDS	357,200.					
	=====	=====	=====	=====	=====	=====

	Global Benefits Group Inc	GBG Administrative Services	GBG Assist, Inc.	International Claims Services, Inc.	GBG Holdings, Inc.	Global Benefits Group, US Inc.
	20-3842750	26-4068764	37-1797452	98-0076650	33-0950280	20-4570749
Special Deductions						
1	Domestic Corp-subj. to 50% ded					
2	Domestic Corp-subj. to 65% ded					
3	Debt-Financed stock-Dom & Fgn					
4	Pref Stk < 20% owned Pub Util					
5	Pref Stk >= 20% owned Pub Util					
6	< 20% Fgn Corps & FSC's-50%					
7	>= 20% Fgn Corps & FSC's-65%					
8	Wholly-owned fgn subs-100%					
	-----	-----	-----	-----	-----	-----
9	Total Lines 1-8					
10	Domestic corps-Small Bus Inv					
11	From affiliated group member					
12	From certain FSCs					
13	Foreign-source portion of dividends received from a specified 10%- owned foreign corporation					
15	Section 965(a) inclusion					
16a	Subpart F inclusions derived from the sale by CFC of the stock a lower-tier foreign corporation treated as a dividend					
21	Dividends paid on certain preferred stock of public utilities					
22	Section 250 deduction					
	-----	-----	-----	-----	-----	-----
24	TOTAL SPECIAL DEDUCTIONS					
	=====	=====	=====	=====	=====	=====

Form 1120, Page 4 Detail

=====

Schedule K, Line 5a ----- Name of Corporation	EIN	Country of Incorporation	Percentage Owned in Voting Stock
-----	-----	-----	-----
Global Benefits Group Inc			

Shanghai (GBG) Enterprise MGMT Cons Inc	FOREIGNUS	CH	100.000
GBG Services (India) Private Ltd	FOREIGNUS	IN	74.000
GBG Processing Philippines Inc	FOREIGNUS	RP	95.000
Global Benefits Group Canada Ltd	FOREIGNUS	CA	100.000
GBG Premier S.A. de. C.V	FOREIGNUS	MX	100.000
Global Benefits Group (UK) Limited	FOREIGNUS	UK	100.000
GBG Elite Medical Services S.A. de C.V	FOREIGNUS	MX	100.000
Global Benefits Group (Thailand) Co	FOREIGNUS	TH	100.000
GBG Paraguay Sociedad Anomima	FOREIGNUS	PA	100.000
Quality Health Management LLC	65-1003375	US	100.000

Global Benefits Group Inc and Subs

20-3842750

Combined

ELIMINATIONS

Adjustments

Global Benefits

Group Inc and Subs

Consolidated Schedules

Sch. L - Beginning

Assets		-----	-----	-----	-----
1	Cash	11,774,017.			11,774,017.
2 a	Trade Notes and A/R	44,936,882.			44,936,882.
b	Less allowance for Bad Debts				
3	Inventories	NONE			NONE
4	US Government Obligations				
5	Tax-exempt Securities				
6	Other Current Assets	25,402,951.			25,402,951.
7	Loans to Stockholders				
8	Mtge and Real Estate Loans				
9	Other Investments	1,309,685.			1,309,685.
10 a	Buildings and Other Depreciable				
	Assets	17,188,584.			17,188,584.
b	Less Accum. Depreciation	12,906,758.			12,906,758.
11 a	Depletable Assets				
b	Less Accum. Depletion				
12	Land (net of any Amortization)				
13 a	Intangible Assets	4,618,817.			4,618,817.
b	Less Accum. Amortization				
14	Other Assets	2,974,650.			2,974,650.
		-----	-----	-----	-----
15	Total Assets	95,298,828.			95,298,828.
		=====	=====	=====	=====
Liabilities and Stockholders' Equity					
16	Accounts Payable	18,719,149.			18,719,149.
17	Mtges, Notes, Bond Payable				
	in less than 1 year				
18	Other Current Liabilities	126,127,245.			126,127,245.
19	Loans from Stockholders				
20	Mtges, Notes, Bonds Payable				
	in 1 year or more				
21	Other Liabilities	81,238.			81,238.
22 a	Capital stock-Preferred				
b	Capital stock-Common	1,118.			1,118.
23	Additional Paid-in Capital	4,664,124.			4,664,124.
24	Retained earnings-Appropriated				
25	Retained earnings-Unappropriated	-54,694,046.			-54,694,046.
26	Adjustments to shareholders' equity				
27	Less cost of Treasury Stock	-400,000.			-400,000.
28	Total Liabilities and	-----	-----	-----	-----
	Stockholders' Equity	95,298,828.			95,298,828.
		=====	=====	=====	=====

JSA
2C9094 1.000

0001WA X45R

20-3842750

Statement

13

Global Benefits Group Inc and Subs		Global Benefits Group Inc	GBG Administrative Services	GBG Assist, Inc.	International Claims Services, Inc.	GBG Holdings, Inc.	Global Benefits Group, US Inc.
Consolidated Schedules							
Sch. L - Beginning		20-3842750	26-4068764	37-1797452	98-0076650	33-0950280	20-4570749
Assets		-----	-----	-----	-----	-----	-----
1	Cash	6,324,351.	3,493,553.	276,877.	311,322.	1,367,914.	
2 a	Trade Notes and A/R	7,553,699.	717.	14,434,862.	33,904.	22,913,700.	
b	Less allowance for Bad Debts						
3	Inventories				NONE		
4	US Government Obligations						
5	Tax-exempt Securities						
6	Other Current Assets	104,804,060.	2,102,683.	-3,682,415.	-123,756,335.	44,789,458.	1,145,500.
7	Loans to Stockholders						
8	Mtge and Real Estate Loans						
9	Other Investments	1,035,335.		274,350.			
10 a	Buildings and Other Depreciable Assets	17,011,218.		3,154.	77,312.	96,900.	
b	Less Accum. Depreciation	12,732,546.			77,312.	96,900.	
11 a	Depletable Assets						
b	Less Accum. Depletion						
12	Land (net of any Amortization)						
13 a	Intangible Assets	4,618,817.					
b	Less Accum. Amortization						
14	Other Assets	2,974,650.		NONE	NONE		
		-----	-----	-----	-----	-----	-----
15	Total Assets	131,589,584.	5,596,953.	11,306,828.	-123,411,109.	69,071,072.	1,145,500.
		=====	=====	=====	=====	=====	=====
Liabilities and Stockholders' Equity							
16	Accounts Payable	4,535,965.		-17,529.	14,153,890.	46,823.	
17	Mtges, Notes, Bond Payable in less than 1 year						
18	Other Current Liabilities	202,109,354.	5,004,143.	-2,764,484.	-134,560,079.	55,247,486.	1,090,825.
19	Loans from Stockholders						
20	Mtges, Notes, Bonds Payable in 1 year or more						
21	Other Liabilities	81,238.					
22 a	Capital stock-Preferred						
b	Capital stock-Common	16.			1,001.	1.	100.
23	Additional Paid-in Capital	4,554,984.	1,000.		108,140.		
24	Retained earnings-Appropriated						
25	Retained earnings-Unappropriated	-80,091,973.	591,810.	14,088,841.	-3,114,061.	13,776,762.	54,575.
26	Adjustments to shareholders' equity						
27	Less cost of Treasury Stock	-400,000.					
28	Total Liabilities and Stockholders' Equity	131,589,584.	5,596,953.	11,306,828.	-123,411,109.	69,071,072.	1,145,500.
		=====	=====	=====	=====	=====	=====

Global Benefits Group Inc and Subs

20-3842750

Combined

ELIMINATIONS

Adjustments

Global Benefits

Group Inc and Subs

Consolidated Schedules

Sch. L - Ending

Assets		-----	-----	-----	-----
1	Cash	9,439,592.			9,439,592.
2 a	Trade Notes and A/R	18,246.			18,246.
b	Less allowance for Bad Debts				
3	Inventories	NONE			NONE
4	US Government Obligations				
5	Tax-exempt Securities				
6	Other Current Assets	59,030,406.			59,030,406.
7	Loans to Stockholders				
8	Mtge and Real Estate Loans				
9	Other Investments	1,129,603.			1,129,603.
10 a	Buildings and Other Depreciable				
	Assets	24,130,294.			24,130,294.
b	Less Accum. Depreciation	13,692,828.			13,692,828.
11 a	Depletable Assets				
b	Less Accum. Depletion				
12	Land (net of any Amortization)				
13 a	Intangible Assets	4,618,817.			4,618,817.
b	Less Accum. Amortization				
14	Other Assets	418,645.			418,645.
		-----	-----	-----	-----
15	Total Assets	85,092,775.			85,092,775.
		=====	=====	=====	=====
Liabilities and Stockholders' Equity					
16	Accounts Payable	1,352,858.			1,352,858.
17	Mtges, Notes, Bond Payable				
	in less than 1 year				
18	Other Current Liabilities	137,808,499.			137,808,499.
19	Loans from Stockholders				
20	Mtges, Notes, Bonds Payable				
	in 1 year or more				
21	Other Liabilities	NONE			NONE
22 a	Capital stock-Preferred				
b	Capital stock-Common	1,117.			1,117.
23	Additional Paid-in Capital	4,664,124.			4,664,124.
24	Retained earnings-Appropriated				
25	Retained earnings-Unappropriated	-59,133,823.			-59,133,823.
26	Adjustments to Shareholders' Equity				
27	Less cost of Treasury Stock	-400,000.			-400,000.
28	Total Liabilities and	-----	-----	-----	-----
	Stockholders' Equity	85,092,775.			85,092,775.
		=====	=====	=====	=====

JSA
2C9095 1.000

0001WA

X45R

20-3842750

Statement

15

Global Benefits Group Inc and Subs		Global Benefits Group Inc	GBG Administrative Services	GBG Assist, Inc.	International Claims Services, Inc.	GBG Holdings, Inc.	Global Benefits Group, US Inc.
Consolidated Schedules							
Sch. L - Ending		20-3842750	26-4068764	37-1797452	98-0076650	33-0950280	20-4570749
Assets		-----	-----	-----	-----	-----	-----
1	Cash	6,399,385.	1,750,413.	139,467.	1,150,327.	NONE	
2 a	Trade Notes and A/R	NONE	717.	17,529.		NONE	
b	Less allowance for Bad Debts						
3	Inventories				NONE		
4	US Government Obligations						
5	Tax-exempt Securities						
6	Other Current Assets	32,934,837.	3,209,548.	21,316,821.	1,514,524.	NONE	54,676.
7	Loans to Stockholders						
8	Mtge and Real Estate Loans						
9	Other Investments	1,035,335.		94,268.			
10 a	Buildings and Other Depreciable Assets	24,052,981.		NONE	77,313.	NONE	
b	Less Accum. Depreciation	13,615,515.			77,313.	NONE	
11 a	Depletable Assets						
b	Less Accum. Depletion						
12	Land (net of any Amortization)						
13 a	Intangible Assets	4,618,817.					
b	Less Accum. Amortization						
14	Other Assets	418,645.		NONE			
		-----	-----	-----	-----	-----	-----
15	Total Assets	55,844,485.	4,960,678.	21,568,085.	2,664,851.	NONE	54,676.
		=====	=====	=====	=====	=====	=====
Liabilities and Stockholders' Equity							
16	Accounts Payable	1,344,025.		8,833.	NONE	NONE	
17	Mtges, Notes, Bond Payable in less than 1 year						
18	Other Current Liabilities	128,221,114.	2,807,569.	306,611.	6,473,205.	NONE	NONE
19	Loans from Stockholders						
20	Mtges, Notes, Bonds Payable in 1 year or more						
21	Other Liabilities	NONE					
22 a	Capital stock-Preferred						
b	Capital stock-Common	16.			1,001.	NONE	100.
23	Additional Paid-in Capital	4,554,984.	1,000.		108,140.		
24	Retained earnings-Appropriated						
25	Retained earnings-Unappropriated	-78,675,654.	2,152,109.	21,252,641.	-3,917,495.	NONE	54,576.
26	Adjustments to Shareholders' Equity						
27	Less cost of Treasury Stock	-400,000.					
28	Total Liabilities and Stockholders' Equity	55,844,485.	4,960,678.	21,568,085.	2,664,851.	NONE	54,676.
		=====	=====	=====	=====	=====	=====

JSA
2C9095 1.000

Form 1120 Page 6 Detail, Sch. L

	Beginning	Ending
	-----	-----
Line 6 - Other Current Assets		
=====		
Global Benefits Group Inc		

Other Current Assets	NONE	NONE
Deposit	191,122.	87,617.
Intercompany Receivables	-299,092,088.	NONE
Prepaid Expenses	725,172.	760,653.
Prepaid Insurance	448,216.	NONE
Prepaid Rent	61,477.	NONE
Due From GBG	318,717,290.	5,044,578.
Due form GBG US	69,892.	NONE
Due from GBGH	72,392,267.	NONE
Due from GBE	-250,000.	NONE
Due from GIL	3,305,887.	NONE
Due from Saxton	2,144,470.	NONE
Deferred Acquisition Costs	17,956,980.	15,948,966.
Due from GSLIL	14,058.	NONE
Due From GBG UK	-6,477,798.	NONE
Advances & Loans	22,468.	NONE
Due From QHM	-2,000,000.	NONE
Due from GMBH	-31,036.	NONE
Undeposited Funds	-389,321.	NONE
Misc. Receivable	65,000.	NONE
Quality Health Management	-1,086,809.	NONE
Due from GWAC	-1,000.	NONE
Due from GBG CayCo	100.	NONE
In & Out	-1,982,287.	NONE
Other Receivables	NONE	11,093,023.
	-----	-----
Subtotal	104,804,060.	32,934,837.
	-----	-----
GBG Administrative Services		

Deposit	-18,577.	NONE
Undeposited Funds	-11,969.	NONE
Due From GBG	3,110,468.	216,008.
Due From ICS	987,069.	NONE
Due from GBG Assist	2,334,373.	NONE
Due from GBGH	-3,581,335.	NONE
Due from GIL	-481,029.	2,993,540.
Due from GBG US	-236,317.	NONE
	-----	-----
Subtotal	2,102,683.	3,209,548.
	-----	-----

Continued on next page

Statement 17

Form 1120 Page 6 Detail, Sch. L

	Beginning	Ending
	-----	-----
Line 6 - Other Current Assets (Cont'd)		
=====		
GBG Assist, Inc.		

Other Current Assets	NONE	20,097,844.
Deposit	20,304.	100,000.
Prepaid Expenses	NONE	6,498.
Due From GBG	652,221.	962,221.
Due from GBG Canada	246,856.	146,856.
Due from GBGI	NONE	3,402.
Due from GIL	-2,102,641.	NONE
Due from ICS	-71,577.	NONE
Due from GBGH	-115,915.	NONE
Due from GBG China	1,830.	NONE
Due from GBE	-46,720.	NONE
GBG Admin. Services	-2,334,373.	NONE
Due from SAXTON	3,402.	NONE
Advances & Loans	52,229.	NONE
Undeposited Funds	11,969.	NONE
	-----	-----
Subtotal	-3,682,415.	21,316,821.
	-----	-----
International Claims Services, Inc.		

Deposit	4,100,578.	520,885.
Due From GBG	-6,329,035.	NONE
Due from GBG Assist	71,577.	NONE
Due from GBGH	-22,356,513.	NONE
Due from GIL	-93,719,910.	993,639.
Due from GBG China	6,539,996.	NONE
Due from GBE	-11,013,762.	NONE
GBG Admin. Services	-983,503.	NONE
Due from GBG US	-70,000.	NONE
	-700.	
	4,937.	
	-----	-----
Subtotal	-123,756,335.	1,514,524.
	-----	-----
GBG Holdings, Inc.		

Deposit	1,736,041.	NONE
Intercompany Receivables	-553,827.	NONE
Prepaid Expenses	606,267.	NONE
Due From GBG	148,548,675.	
Due From ICS	22,356,513.	NONE

Continued on next page

Statement 18

Form 1120 Page 6 Detail, Sch. L

	Beginning	Ending
	-----	-----
Line 6 - Other Current Assets (Cont'd)		
=====		
Due from GBG Assist	115,915.	
Due from GBGH	-72,316,254.	
Due from GBG China	-11,556,628.	NONE
Due from GBE	34,928,582.	
Due From GBG Admin. Services	3,581,335.	
Due from GIL	-85,063,610.	NONE
Due from GBG US	-905,727.	NONE
Due from Saxton	13,775.	NONE
Due From Zambia	405,736.	NONE
Due Form Thailand	4,580.	NONE
Claims Receivable	863,720.	NONE
Misc. Receivable	-372.	NONE
Profit Share Receivable	2,119,158.	NONE
Deferred Acquisition Costs	-109,000.	NONE
Due from GSLIL	1,579.	NONE
Due From GBG UK	13,000.	NONE
	-----	-----
Subtotal	44,789,458.	NONE
	-----	-----
Global Benefits Group, US Inc.		

Due From GBG	3,456.	54,676.
Due from GBGH	905,727.	NONE
GBG Admin. Services	236,317.	NONE
	-----	-----
Subtotal	1,145,500.	54,676.
	-----	-----
Total Line 6 - Other Current Assets	25,402,951.	59,030,406.
	=====	=====

Line 14 - Other Assets

=====

Global Benefits Group Inc

Other Non-Current Assets	2,974,650.	NONE
Claims Receivable	NONE	3,170.
Income Tax Receivable	NONE	415,475.
	-----	-----
Subtotal	2,974,650.	418,645.
	-----	-----

Continued on next page

Statement 19

Form 1120 Page 6 Detail, Sch. L

=====

	Beginning	Ending
	-----	-----
Line 14 - Other Assets (Cont'd)		
=====		
GBG Assist, Inc.		

Other Assets	NONE	NONE
	-----	-----
Subtotal	NONE	NONE
	-----	-----
International Claims Services, Inc.		

Other Assets	NONE	
	-----	-----
Subtotal	NONE	
	-----	-----
Total Line 14 - Other Assets	2,974,650.	418,645.
	=====	=====

Form 1120 Page 6 Detail, Sch. L

	Beginning	Ending
	-----	-----
Line 18 - Other Current Liabilities		
=====		
Global Benefits Group Inc		

Other Current Liabilities	NONE	11,739,722.
Deferred Revenue - Current	-57,418.	NONE
Accrued Expenses	3,799,893.	4,850,658.
Accrued Vacation	495,222.	NONE
Accrued Payroll & WH	409,398.	79,539.
Unearned Income	-35,940,789.	NONE
Premium Payable	-8,910,602.	NONE
Commissions Payable	174,491,271.	4,997,479.
Foreign Income Taxes Payable	-35,677.	NONE
Income Taxes Payable - Deferred	416,431.	NONE
Income Taxes Payable - State	-22,633.	NONE
Credit Card Payable	33,960.	181,606.
Payroll Tax Payable	169,066.	NONE
Unearned Deferred Commissions	67,407,682.	29,343,455.
Income Taxes Payable - Federal	-146,450.	NONE
Lease Liability	NONE	5,613,593.
Intercompany Payables	NONE	71,415,062.
	-----	-----
Subtotal	202,109,354.	128,221,114.
	-----	-----
GBG Administrative Services		

Other Current Liabilities	NONE	1,984,440.
Accrued Expenses	20,400.	86,504.
Claim Deposits	1,805,540.	NONE
Unearned Income	NONE	736,625.
Premium Payable	3,257,311.	NONE
Commissions Payable	-79,108.	NONE
	-----	-----
Subtotal	5,004,143.	2,807,569.
	-----	-----
GBG Assist, Inc.		

Premium Payable	-2,725,928.	NONE
Accrued Expenses	NONE	300,000.
Accrued Payroll	-20,831.	6,611.
Claim Deposit	-17,725.	NONE
	-----	-----
Subtotal	-2,764,484.	306,611.
	-----	-----

Continued on next page

Statement 21

Form 1120 Page 6 Detail, Sch. L

	Beginning	Ending
	-----	-----
Line 18 - Other Current Liabilities (Cont'd)		
=====		
International Claims Services, Inc.		

Claim Deposits	149,971.	NONE
Unearned Income	4,939,514.	NONE
Premium Payable	-139,649,564.	NONE
Due to GBG	NONE	4,958,681.
Premium Suspense	NONE	1,514,524.
	-----	-----
Subtotal	-134,560,079.	6,473,205.
	-----	-----
GBG Holdings, Inc.		

Accrued Expenses	216,656.	NONE
Accrued Payroll & WH	-133.	NONE
Unearned Income	31,113,622.	NONE
Premium Payable	116,846,903.	NONE
Commissions Payable	-109,808,328.	NONE
Premium Payable - GIL	16,878,766.	NONE
	-----	-----
Subtotal	55,247,486.	NONE
	-----	-----
Global Benefits Group, US Inc.		

Premium Payable	1,090,825.	NONE
	-----	-----
Subtotal	1,090,825.	NONE
	-----	-----
Total Line 18 - Other Current Liabilities	126,127,245.	137,808,499.
	=====	=====

Form 1120 Page 6 Detail, Sch. L
=====

	Beginning	Ending
	-----	-----
Line 21 - Other Liabilities		
=====		
Global Benefits Group Inc		

Deferred Rent Expense	81,238.	NONE
	-----	-----
Subtotal	81,238.	NONE
	-----	-----
Total Line 21 - Other Liabilities	81,238.	NONE
	=====	=====

Combined

ELIMINATIONS

Adjustments

Global Benefits
Group Inc and Subs

Consolidated Schedules
Sch. M1 and M-2 Summary

Schedule M-1

- 1 Net income per books
- 2 Federal Income Tax
- 3 Excess Capital Losses
- 4 Income Subject to Tax not on Books
- 5 Expenses Recorded on Books
not Deducted on Return
 - a Depreciation
 - b Charitable Contributions
 - c Travel and EntertainmentOther
- 6 Total Lines 1-5
- 7 Income Recorded on Books
not Included on Return
 - a Tax-exempt InterestOther
- 8 Deductions on Return not on Books
 - a Depreciation
 - b Charitable ContributionsOther
- 9 Total Lines 7 and 8
- 10 Income (Line 28, Page 1)

Schedule M-2

1	Balance at beginning of year	-54,694,046.			-54,694,046.
2	Net Income per Books	-4,507,548.			-4,507,548.
3	Other Increases	13,844,533.			13,844,533.
		-----	-----	-----	-----
4	Total Line 1-3	-45,357,061.			-45,357,061.
5	Distributions				
	a Cash				
	b Stock				
	c Property				
6	Other Decreases	13,776,762.			13,776,762.
		-----	-----	-----	-----
7	Total lines 5 and 6	13,776,762.			13,776,762.
		-----	-----	-----	-----
8	Balance at end of year	-59,133,823.			-59,133,823.

JSA
2C9096 1.000

=====

=====

=====

=====

	Global Benefits Group Inc	GBG Administrative Services	GBG Assist, Inc.	International Claims Services, Inc.	GBG Holdings, Inc.	Global Benefits Group, US Inc.
Consolidated Schedules						
Sch. M1 and M-2 Summary	20-3842750	26-4068764	37-1797452	98-0076650	33-0950280	20-4570749

Schedule M-1

- 1 Net income per books
- 2 Federal Income Tax
- 3 Excess Capital Losses
- 4 Income Subject to Tax not on Books
- 5 Expenses Recorded on Books
not Deducted on Return
a Depreciation
b Charitable Contributions
c Travel and Entertainment
Other
- 6 Total Lines 1-5
- 7 Income Recorded on Books
not Included on Return
a Tax-exempt Interest
Other
- 8 Deductions on Return not on Books
a Depreciation
b Charitable Contributions
Other
- 9 Total Lines 7 and 8
- 10 Income (Line 28, Page 1)

Schedule M-2

1	Balance at beginning of year	-80,091,973.	591,810.	14,088,841.	-3,114,061.	13,776,762.	54,575.
2	Net Income per Books	-12,316,314.	1,448,400.	7,163,800.	-803,434.		
3	Other Increases	13,732,633.	111,899.				1.
		-----	-----	-----	-----	-----	-----
4	Total Line 1-3	-78,675,654.	2,152,109.	21,252,641.	-3,917,495.	13,776,762.	54,576.
5	Distributions						
	a Cash						
	b Stock						
	c Property						
6	Other Decreases					13,776,762.	
		-----	-----	-----	-----	-----	-----
7	Total lines 5 and 6					13,776,762.	
		-----	-----	-----	-----	-----	-----
8	Balance at end of year	-78,675,654.	2,152,109.	21,252,641.	-3,917,495.	NONE	54,576.
JSA		=====	=====	=====	=====	=====	=====
2C9096 1.000							

1120 Page 6 Detail

Sch. M-2, Line 3 - Other Increases

Global Benefits Group Inc

Other Increases	13,732,633.
Subtotal	13,732,633.

GBG Administrative Services

Other Increases	111,899.
Subtotal	111,899.

Global Benefits Group, US Inc.

Other Increase	1.
Subtotal	1.

Total Sch. M-2, Line 3 - Other Increases	13,844,533.
--	-------------

Sch. M-2, Line 6 - Other Decreases

GBG Holdings, Inc.

Other Decreases	13,776,762.
Subtotal	13,776,762.

Total Sch. M-2, Line 6 - Other Decreases	13,776,762.
--	-------------

Schedule N

=====

Question 6 - Foreign Countries

Global Benefits Group Inc

OC

Schedule M-3, Part I Detail

Line 5a - Net income from nonincludible foreign entities

Name	EIN	Net Income	Total Assets	Total Liabilities	Net Amounts
Global Benefits Europe B.V.	FOREIGNUS				
GBG Elite Medical Services, S.A. DE C.V.	FOREIGNUS				
GBG Processing and Consulting Services	FOREIGNUS				
GBG Premier, S.A. DE C.V.	FOREIGNUS				
GBG Services (India) Private Limited	FOREIGNUS				
Global Benefits Group (Thailand) Co. LTD	FOREIGNUS				
Global Benefits Group Canada Ltd	FOREIGNUS				
Global Benefits Group GmbH	FOREIGNUS				
Global Security Life Insurance Limited	FOREIGNUS				
GBGI Limited	FOREIGNUS				
Shanghai (GBG) Enterprise Mgt Consulting	FOREIGNUS				
GBG Insurance Limited	FOREIGNUS				
GBG Insurance Zambia Limited	FOREIGNUS				
Total					

Line 6a - Net income from nonincludible U.S. entities

Name	EIN	Net Income	Total Assets	Total Liabilities	Net Amounts
Global Security Life Insurance LTD (DE)	47-2539804				
Total					

Combined

ELIMINATIONS

Consolidated Schedules

Schedule M-3, Part II

	Per Inc Stmt	Temporary	Permanent	Per Tax Return	Per Inc Stmt	Temporary	Permanent	Per Tax Return
1	Income (loss) from equity method foreign corp.							
2	Gross foreign dividends not previously taxed							
3	Subpart F, QEF, and similar income inclusions	2,009.	355,191.	357,200.				
4	Gross-up for foreign taxes deemed paid							
5	Gross foreign distrib. previously taxed							
6	Income (loss) from equity method U.S. corp.							
7	U.S. dividends not eliminated in tax consolidation							
8	Minority interest for includible corp.							
9	Income (loss) from U.S. partnerships							
10	Income (loss) from foreign partnerships							
11	Income (loss) from other pass-through entities							
12	Items relating to reportable transactions							
13	Interest income							
14	Total accrual to cash adjustment							
15	Hedging transactions							
16	Mark-to-market income (loss)							
17	Cost of goods sold							
18	Sales versus lease							
19	Section 481(a) adjustments							
20	Unearned/deferred revenue							
21	Income recognition from long-term contracts							
22	Original issue discount/imputed interest							
23a	Income statement gain/loss on sale, exchange, or abandonment	-361,753.	361,753.					
23b	Gross cap. gains from Sch. D, excluding amount from pass-through entities							
23c	Gross cap. losses from Sch. D, exc. pass-through ent., abandonment, worthless stock		-361,753.	-361,753.				
23d	Net gain/loss reported on Form 4797							
23e	Abandonment losses							
23f	Worthless stock losses							
23g	Other gain/loss on disposition of assets other than inventory							
24	Capital loss limitation and carryforward used							
25	Other income (loss) items with differences							
26	Total income (loss) items	-361,753.	2,009.	355,191.	-4,553.			
		=====	=====	=====	=====	=====	=====	=====
27	Total expense/deduction items	-9,009,229.	2,543,602.	364,669.	-6,100,958.			
		=====	=====	=====	=====	=====	=====	=====
28	Other items with no differences	4,863,434.			4,863,434.			
29a	1120 subgroup reconciliation totals	-4,507,548.	2,545,611.	719,860.	-1,242,077.			
29b	PC insurance subgroup reconciliation totals							
29c	Life insurance subgroup reconciliation totals							
		-----	-----	-----	-----	-----	-----	-----
30	Reconciliation totals	-4,507,548.	2,545,611.	719,860.	-1,242,077.			
JSA		=====	=====	=====	=====	=====	=====	=====
2C8042 1.000								

Consolidated Schedules		Per Inc Stmt	Temporary	Permanent	Per Tax Return	Per Inc Stmt	Temporary	Permanent	Per Tax Return
Schedule M-3, Part II		-----	-----	-----	-----	-----	-----	-----	-----
1	Income (loss) from equity method foreign corp.								
2	Gross foreign dividends not previously taxed								
3	Subpart F, QEF, and similar income inclusions						2,009.	355,191.	357,200.
4	Gross-up for foreign taxes deemed paid								
5	Gross foreign distrib. previously taxed								
6	Income (loss) from equity method U.S. corp.								
7	U.S. dividends not eliminated in tax consolidation								
8	Minority interest for includible corp.								
9	Income (loss) from U.S. partnerships								
10	Income (loss) from foreign partnerships								
11	Income (loss) from other pass-through entities								
12	Items relating to reportable transactions								
13	Interest income								
14	Total accrual to cash adjustment								
15	Hedging transactions								
16	Mark-to-market income (loss)								
17	Cost of goods sold								
18	Sales versus lease								
19	Section 481(a) adjustments								
20	Unearned/deferred revenue								
21	Income recognition from long-term contracts								
22	Original issue discount/imputed interest								
23a	Income statement gain/loss on sale, exchange, or abandonment				-361,753.		361,753.		
23b	Gross cap. gains from Sch. D, excluding amount from pass-through entities								
23c	Gross cap. losses from Sch. D, exc. pass-through ent., abandonment, worthless stock						-361,753.		-361,753.
23d	Net gain/loss reported on Form 4797								
23e	Abandonment losses								
23f	Worthless stock losses								
23g	Other gain/loss on disposition of assets other than inventory								
24	Capital loss limitation and carryforward used								
25	Other income (loss) items with differences								
26	Total income (loss) items					-361,753.	2,009.	355,191.	-4,553.
		=====	=====	=====	=====	=====	=====	=====	=====
27	Total expense/deduction items					-9,009,229.	2,543,602.	364,669.	-6,100,958.
		=====	=====	=====	=====	=====	=====	=====	=====
28	Other items with no differences					4,863,434.			4,863,434.
29a	1120 subgroup reconciliation totals					-4,507,548.	2,545,611.	719,860.	-1,242,077.
29b	PC insurance subgroup reconciliation totals								
29c	Life insurance subgroup reconciliation totals								
		-----	-----	-----	-----	-----	-----	-----	-----
30	Reconciliation totals					-4,507,548.	2,545,611.	719,860.	-1,242,077.
JSA		=====	=====	=====	=====	=====	=====	=====	=====
2C8042 1.000									

Combined				ELIMINATIONS				
Consolidated Schedules	Per Inc Stmt	Temporary	Permanent	Per Tax Return	Per Inc Stmt	Temporary	Permanent	Per Tax Return
Schedule M-3, Part III	-----	-----	-----	-----	-----	-----	-----	-----
1 U.S. current income tax exp.	277,010.		-277,010.					
2 U.S. deferred income tax exp.								
3 State and local current income tax exp.	28,441.	16,568.		45,009.				
4 State and local deferred income tax exp.								
5 Foreign current income tax exp.								
6 Foreign deferred income tax exp.								
7 Foreign withholding taxes								
8 Interest expense	180,082.			180,082.				
9 Stock option expense								
10 Other equity-based compensation								
11 Meals and entertainment	169,226.		-87,659.	81,567.				
12 Fines and penalties								
13 Judgments, damages, awards, and similar costs								
14 Parachute payments								
15 Compensation with sect. 162(m) limitation								
16 Pension and profit-sharing	1,860,857.			1,860,857.				
17 Other post-retirement benefits								
18 Deferred compensation								
19 Charitable contribution - cash/tangibles								
20 Charitable contribution - intangible								
21 Charitable contribution limitation/carryforward								
22 Domestic production activities deduction								
23 Current year acquisition or reorg. investment banking fees								
24 Current year acquisition or reorg. legal and accounting fees								
25 Current year acquisition/reorg. other costs								
26 Amortization/impairment of goodwill								
27 Amortization of acquisition and reorg.								
28 Other amort. or impairment write-offs		53,224.		53,224.				
30 Depletion								
31 Depreciation	4,083,673.	-1,814,312.		2,269,361.				
32 Bad debt expense								
33 Corporate owned life insurance premiums								
34 Purchase versus lease								
35 Research and development costs								
36 Section 118 exclusion								
37 Section 162(r) - FDIC premiums paid by certain large financial institutions (see instructions)								
38 Other expense/ded. items with differ.	2,409,940.	-799,082.		1,610,858.				
	-----	-----	-----	-----	-----	-----	-----	-----
39 Total expense/deduction items	9,009,229.	-2,543,602.	-364,669.	6,100,958.				
JSA 2C8044 1.000	=====	=====	=====	=====	=====	=====	=====	=====

0001WA

X45R

20-3842750

Statement

31

Adjustments					Global Benefits Group Inc and Subs			
Consolidated Schedules	Per Inc Stmt	Temporary	Permanent	Per Tax Return	Per Inc Stmt	Temporary	Permanent	Per Tax Return
Schedule M-3, Part III	-----	-----	-----	-----	-----	-----	-----	-----
1 U.S. current income tax exp.					277,010.		-277,010.	
2 U.S. deferred income tax exp.								
3 State and local current income tax exp.					28,441.	16,568.		45,009.
4 State and local deferred income tax exp.								
5 Foreign current income tax exp.								
6 Foreign deferred income tax exp.								
7 Foreign withholding taxes								
8 Interest expense					180,082.			180,082.
9 Stock option expense								
10 Other equity-based compensation								
11 Meals and entertainment					169,226.		-87,659.	81,567.
12 Fines and penalties								
13 Judgments, damages, awards, and similar costs								
14 Parachute payments								
15 Compensation with sect. 162(m) limitation								
16 Pension and profit-sharing					1,860,857.			1,860,857.
17 Other post-retirement benefits								
18 Deferred compensation								
19 Charitable contribution - cash/tangibles								
20 Charitable contribution - intangible								
21 Charitable contribution limitation/carryforward								
22 Domestic production activities deduction								
23 Current year acquisition or reorg. investment banking fees								
24 Current year acquisition or reorg. legal and accounting fees								
25 Current year acquisition/reorg. other costs								
26 Amortization/impairment of goodwill								
27 Amortization of acquisition and reorg.								
28 Other amort. or impairment write-offs						53,224.		53,224.
30 Depletion								
31 Depreciation					4,083,673.	-1,814,312.		2,269,361.
32 Bad debt expense								
33 Corporate owned life insurance premiums								
34 Purchase versus lease								
35 Research and development costs								
36 Section 118 exclusion								
37 Section 162(r) - FDIC premiums paid by certain large financial institutions (see instructions)								
38 Other expense/ded. items with differ.					2,409,940.	-799,082.		1,610,858.
39 Total expense/deduction items	-----	-----	-----	-----	9,009,229.	-2,543,602.	-364,669.	6,100,958.
JSA 2C8044 1.000	=====	=====	=====	=====	=====	=====	=====	=====
0001WA X45R					20-3842750		Statement	32

Schedule M-3, Part III Detail

Line 38 - Other expense/deduction items with differences

Description	Expense Per Income Stmt	Temporary Difference	Permanent Difference	Deduction Per Tax Return
Global Benefits Group Inc				
Vacation Expense	1,167,721.	-326,249.		841,472.
Rent Expense	1,242,219.	-472,833.		769,386.
Subtotal	2,409,940.	-799,082.		1,610,858.
Total	2,409,940.	-799,082.		1,610,858.

Global Benefits Group Inc and Subs
Combined ELIMINATIONS Adjustments Global Benefits
Group Inc and Subs

Consolidated Schedules - Form 4562

Consolidated 4562 Summary

Part I - Section 179 Expense

- 2 Sec 179 property placed in Service in current year
- 6 Nonlisted property
- 7 Listed property
- 8 Total elected cost
- 9 Tentative deduction
- 10 Carryover from 2017
- 12 Sec 179 expense deduction
- 13 Carryover to 2019

Part II - Other Depreciation

- 14 Special depreciation allowance 1,668,233.
- 15 Property subject to 168(f)(1)
- 16 ACRS and other depreciation 581,204.

Part III - MACRS

- 17 MACRS deduction - prior years 19,923.
- 19 General Depreciation System
 - a. 3-year property
 - b. 5-year property
 - c. 7-year property
 - d. 10-year property
 - e. 15-year property
 - f. 20-year property
 - g. 25-year property
 - h. 27.5-year residential real
 - i. 39-year nonresidential real
- 20 Alternative Depreciation System
 - a. Class life
 - b. 12-year
 - c. 30-year
 - d. 40-year

Part IV - Summary

- 21 Listed Property
- 22 Total depreciation 2,269,360.
- 42 Amortization - current year
- 43 Amortization - prior year 53,224.
- 44 Total Amortization 53,224.

Global Benefits Group Inc and Subs	Global Benefits	GBG	GBG Assist, Inc	International	GBG Holdings,	Global Benefits
	Group Inc	Administrative		Claims Services	Inc.	Group, US Inc.
		Services		Inc.		

Consolidated Schedules - Form 4562

Consolidated 4562 Summary	20-3842750	26-4068764	37-1797452	98-0076650	33-0950280	20-4570749
----------------------------------	------------	------------	------------	------------	------------	------------

Part I - Section 179 Expense

- 2 Sec 179 property placed in Service in current year
- 6 Nonlisted property
- 7 Listed property
- 8 Total elected cost
- 9 Tentative deduction
- 10 Carryover from 2017
- 12 Sec 179 expense deduction
- 13 Carryover to 2019

Part II - Other Depreciation

- 14 Special depreciation allowance 1,668,233.
- 15 Property subject to 168(f)(1)
- 16 ACRS and other depreciation 581,204.

Part III - MACRS

- 17 MACRS deduction - prior years 19,923.
- 19 General Depreciation System
 - a. 3-year property
 - b. 5-year property
 - c. 7-year property
 - d. 10-year property
 - e. 15-year property
 - f. 20-year property
 - g. 25-year property
 - h. 27.5-year residential real
 - i. 39-year nonresidential real
- 20 Alternative Depreciation System
 - a. Class life
 - b. 12-year
 - c. 30-year
 - d. 40-year

Part IV - Summary

- 21 Listed Property
- 22 Total depreciation** 2,269,360.
- 42 Amortization - current year
- 43 Amortization - prior year 53,224.
- 44 Total Amortization** 53,224.

SHANGHAI(GBG) ENTERPRISE MANAGEMENT CONSULTING

Form 5471, Page 4 Detail

	Beginning		Ending	
	Func Currency	US Currency	Func Currency	US Currency
Sch F, Line 5 - Other current assets				

OTHER RECEIVABLES		48,801.		NONE
CLAIM OVERPAYMENT -TAIPING		371,703.		NONE
CLAIM OVERPAYMENT -PICC		56,290.		NONE
CLAIM OVERPAYMENT -AIC		44,653.		NONE
CLIAM OVERPAYMENT - GIL		15,568.		NONE
MEDILINK - TAIPING		697,851.		NONE
SECURITY DEPOSITS - RENT		-11,483.		NONE
BUMA		102,938.		NONE
PREPAID TO PROVIDER		271,419.		NONE
MEDLINK -PICC		-92,731.		NONE
MEDLINK - GIL		-1,876.		
MEDLINK - AIC		157,923.		NONE
XIANGYA HOSPITAL CENTRAL S UNIV		4,496.		NONE
SIGN HEALTH		29,735.		NONE
Claim Overpayment - SHL		190.		NONE
	-----	-----	-----	-----
Totals		1,695,477.		NONE
	=====	=====	=====	=====
Sch F, Line 7 - Investment in subsidiaries				

Investment in Subsidiaries		15,635.		NONE
	-----	-----	-----	-----
Totals		15,635.		NONE
	=====	=====	=====	=====
Sch F, Line 13 - Other assets				

GBG		163,312.		NONE
GBGH		11,556,628.		NONE
ICS		-6,539,996.		NONE
GBG Assist		-1,830.		
	-----	-----	-----	-----
Totals		5,178,114.		NONE
	=====	=====	=====	=====
Sch F, Line 16 - Other current liabilities				

TAX		82,903.		NONE
BROKER COMM PAYABLE 2012		46.		NONE

Continued on next page

Statement 36

SHANGHAI(GBG) ENTERPRISE MANAGEMENT CONSULTING

Form 5471, Page 4 Detail

	Beginning		Ending	
	Func Currency	US Currency	Func Currency	US Currency
Sch F, Line 16 - Other current liabilities (Cont'd)				
BROKER COMM PAYABLE 2013		9,339.		NONE
BROKER COMM PAYABLE 2014		244,433.		
BROKER COMM PAYABLE 2015		452,136.		NONE
BROKER COMM PAYABLE 2		-291.		NONE
RESERVES - OTHER		11,399.		NONE
UNDERWRITER RESERVES- OTHER		-1,689.		NONE
DUE TO UW GROSS - OTHER		-151,808.		NONE
DUE TO NON GIL FRONT - OTHER		-28,546,676.		NONE
DEPOSIT TO CLAIM- CHINA - OTHER		16,042,005.		
PAID CLAIMS - CNY- GIL		3,956.		NONE
REPRICING FEES		22,096.		NONE
PAID CLAIMS - CNY - TAIPING LTD		53,722.		NONE
PAID CLAIMS - CNY - TAIPING		32,453,700.		NONE
OVERSEAS CLAIM _NON-CNY		687,477.		NONE
CHINA ICS-USD USD		17,578.		NONE
CHINA ICS-CNY USD		207,210.		NONE
PAID CLAIMS - CNY- PICC		339,146.		NONE
PAID CLAIMS - CNY- AIC		1,803,029.		NONE
PAID CLAIMS - ICS		1,847,007.		NONE
ASO PICC		1,866,855.		NONE
ASO AISG		74,550.		NONE
UNAPPLIED PREMIUM - OTHER		-70,956.		NONE
UNAPPLIED TAI-PING		-17,676,080.		NONE
UNAPPLIED PREMIUM PICC		-496,969.		NONE
UNAPPLIED PREMIUM- All TRUST		-266,171.		NONE
UNAPPLIED OVERPAYMENTS		-1,656.		NONE
UNAPPLIED OVERPAYMENTS		94,607.		NONE
Paid Claims - CNY - SH Life		450,960.		NONE
Accrued expenses-other		-800,000.		NONE
Due to GIL		-210,935.		NONE
Paid claims CNY Taping		328,073.		NONE
Totals		8,868,996.		NONE

Form 5471, Page 3 Detail

	Func Currency	US Currency
Sch C, Line 17 - Other Deductions		
PENSION PLAN	1,483,284.	18,874.
TRAINING & DEVELOPMENT	5,187.	66.
MEALS FOR STAFF	147,040.	1,871.
EMPLOYEE RECOGNITION	1,973,521.	25,112.
PRINTING /POSTAGE	249,598.	3,176.
SOFTWARE EXPENSE	114,032.	1,451.
INSURANCE - OTHER	4,610,488.	58,666.
COMMUNICATION	894,026.	11,376.
WORKERS COMP INSURANCE	2,179,345.	27,731.
PROFESSIONAL FEES -OTHER	401,274.	5,106.
ACCOUNTING	767,026.	9,760.
UTILITIES	5,351,973.	68,101.
MAINTENANCE	120,398.	1,532.
BANK CHARGES	56,582.	720.
TRAVEL	1,466,265.	18,657.
MISCELLANEOUS	6,099,993.	77,619.
HOTEL	-4,087.	-52.
OFFICE COST	-178,082.	-2,266.
Total	25,737,863.	327,500.

Sch C, Line 21a - Income tax expense (benefit) - current		
Federal	3,269,651.	41,605.
Total	3,269,651.	41,605.

GBG SERVICES (INDIA) PRIVATE LIMITED

Form 5471, Page 4 Detail

	Beginning		Ending	
	Func Currency	US Currency	Func Currency	US Currency
Sch F, Line 5 - Other current assets				
ADVANCE AND LOANS - OTHERS		23,731.		NONE
PREPAID INSURANCE AND TAXES		432,724.		477,579.
PREPAID EXPENSE INDIA		7,011.		NONE
SECURITY DEPOSITS -RENT		69,119.		NONE
OTHER ASSETS		NONE		121,449.
INTERCO - REC(PAY)-GBG INC		NONE		1,399,862.
Totals		532,585.		1,998,890.
Sch F, Line 13 - Other assets				
Due from GBG Company		1,113,734.		NONE
Totals		1,113,734.		NONE
Sch F, Line 16 - Other current liabilities				
ACCURED EXPENSE -OTHER		6,614.		3,271.
ACCURED EXPENSE		236,097.		225,397.
DEFERRED TAXES PAYABLE		-49,937.		-51,992.
FEDERAL		486,559.		497,809.
LEASE LIABILITY		NONE		1,075,494.
Totals		679,333.		1,749,979.
Sch F, Line 19 - Other liabilities				
OTHER LIABLILITIES		NONE		1.
Totals		NONE		1.

Form 5471, Page 3 Detail

```
=====
```

	Func Currency	US Currency
	-----	-----
Sch C, Line 17 - Other Deductions		

EMPLOYEE INSURANCE	7,605.	5,790.
BANK CHARGES	4,026.	3,065.
COMMUNICATION	53,222.	40,519.
INSURANCE	2,837.	2,160.
LEGAL	14,659.	11,160.
PROFESSIONAL FEES	2,187.	1,665.
AUTO EXPENSE	393.	299.
HOTEL	1,572.	1,197.
MEALS	658.	501.
TRANSPORTATION	2,975.	2,265.
MISCELLANEOUS	-4,144.	-3,155.
	-----	-----
Total	85,990.	65,466.
	=====	=====

GLOBAL BENEFITS GROUP CANADA LTD.

Form 5471, Page 4 Detail

	Beginning		Ending	
	Func	Currency	Func	Currency
Sch F, Line 13 - Other assets				
GBG		-6,558.		NONE
GBG Assist		-246,856.		NONE
GIL		-4,061.		NONE
Due from GBG Company		-185.		NONE
GBG INC		NONE		9,775.
CANADA		NONE		-146,855.
PREMIUM SUSPENSE		NONE		-98,130.
Totals		-257,660.		-235,210.

Sch F, Line 16 - Other current liabilities

BROKER COMM PAYABLE 2017	-17,701.	NONE
BROKER COMM PAYABLE 2018	-103,473.	NONE
BROKER COMM PAYABLE 2019	-65,031.	NONE
Broker Comm Payable 2020	-18,064.	NONE
Broker Comm payable 2021	-8,556.	NONE
UNDERWRITER RESERVES - OTHER	2,265.	NONE
DUE TO NON GIL FRONT - OTHER	-21,169.	NONE
PAID CLAIMS	-286,887.	NONE
UNAPPLIED PREMIUM OTHERS	1,136,030.	NONE
CREDIT CARDS	NONE	2,608.
Totals	617,414.	2,608.

Form 5471, Page 3 Detail

	Func Currency	US Currency
Sch C, Line 9 - Other Income		

ATMSAFE - PHILIPPINE -OTHER	28,411,747.	532,084.
	-----	-----
Total	28,411,747.	532,084.
	=====	=====

Sch C, Line 17 - Other Deductions

CONSULTING	391,155.	7,325.
EMPLOYEE INSURANCE	1,617,664.	30,295.
TRAINING & DEVELOPMENT	48,031.	900.
FRINGE	1,461,630.	27,373.
EMPLOYEE RECOGNITION	107,215.	2,008.
POSTAGE/PRINTING	12,398.	232.
COMMUNICATION	701,395.	13,135.
MARKETING EXPENSE	211,156.	3,954.
DUES & SUBSCRIPTIONS	39,163.	733.
SUPPLIES	116,005.	2,172.
INSURANCE - OTHER	42,739.	800.
LEGAL	606,725.	11,363.
ACCOUNTING	113,724.	2,130.
PROFESSIONAL FEES - OTHER	582,056.	10,901.
UTILITIES	437,000.	8,184.
OCCUPANCY EXPENSE	84,387.	1,580.
LICENSE & FEES	390,228.	7,308.
EQUIPMENT	39,115.	733.
BANK CHARGES	39,294.	736.
AUTO EXPENSES	68,678.	1,286.
MEALS	47,840.	896.
TRANSPORTATION	106,150.	1,988.
MISCELLANEOUS	-4,014,122.	-75,175.
	-----	-----
Total	3,249,626.	60,857.
	=====	=====

Sch C, Line 21a - Income tax expense (benefit) - current

Foreign Income Tax Expense	220,586.	4,131.
	-----	-----
Total	220,586.	4,131.
	=====	=====

GLOBAL BENEFITS GROUP PROCESSING PHILIPPINES IN

Form 5471, Page 4 Detail

	Beginning		Ending	
	Func Currency	US Currency	Func Currency	US Currency
Sch F, Line 5 - Other current assets				
Advances and Loans - Other		4,158.		NONE
Employee advance		17,769.		NONE
Deposits - other		17,999.		NONE
Prepaid expense - other		18,135.		19,528.
Other Assets - Other		NONE		-17,999.
GBG Inc		NONE		-95,037.
GIL		NONE		158,600.
Totals		58,061.		65,092.
Sch F, Line 13 - Other assets				
GBG		-18,524.		NONE
GBGH		-4,937.		NONE
Totals		-23,461.		NONE
Sch F, Line 19 - Other liabilities				
Paid Claims		-162,575.		NONE
Income Taxes Payable - Other		1,312.		2,623.
Accrued Expenses		25,959.		10,601.
Accrued Payroll		1,027.		-72,511.
Foreign Income Tax Payable		3,339.		-1,377.
Totals		-130,938.		-60,664.
Sch F, Line 21 - Paid-in or cap surplus				
Paid-in Capital		200,000.		200,000.
Totals		200,000.		200,000.

Form 5471, Page 3 Detail

	Func Currency	US Currency
Sch C, Line 9 - Other Income		

105% RECHARGE	3,416,106.	4,355,500.
	-----	-----
Total	3,416,106.	4,355,500.
	=====	=====
Sch C, Line 16 - Taxes		

Payroll Tax Expenses	328,656.	419,033.
	-----	-----
Total	328,656.	419,033.
	=====	=====
Sch C, Line 17 - Other Deductions		

Employee Insurance	78,795.	100,463.
Pension Plan	175,018.	223,146.
Training&Development	1,859.	2,370.
Employee Recognition	1,889.	2,408.
Postage/Printing	510.	650.
Communication	11,995.	15,294.
Marketing Expense	73,913.	94,238.
Promotions	1,117.	1,424.
Dues & Subscriptions	16,192.	20,645.
OfficeSupplies	4,815.	6,139.
Software Expense	-6,299.	-8,031.
Insurance - Other	21,153.	26,970.
Workers comp Insurance	3,016.	3,845.
Legal	3,473.	4,428.
Accounting	17,105.	21,809.
Professional Fees- Other	24,759.	31,567.
Recruiting	13,476.	17,182.
Utilities	16,550.	21,101.
Occupancy	3,602.	4,593.
License	11,774.	15,012.
Equipment	13,370.	17,047.
Bank Charges	5,262.	6,709.
Auto Expense	867.	1,105.
Entertainment	335.	427.
Hotel	26,556.	33,859.
Meals	25,027.	31,909.
Transportation	77,791.	99,183.
Travel	20,047.	25,560.

Continued on next page

Statement 44

Form 5471, Page 3 Detail

	Func Currency	US Currency
Sch C, Line 17 - Other Deductions (Cont'd)		
Miscellaneous	6,257.	7,978.
Total	650,224.	829,030.

GLOBAL BENEFITS GROUP (UK) LIMITED

Form 5471, Page 4 Detail

	Beginning		Ending	
	Func Currency	US Currency	Func Currency	US Currency
Sch F, Line 5 - Other current assets				
Employee Advance		98,383.		NONE
Prepaid Expense		NONE		40,577.
GBE		NONE		-282,986.
GBG Inc		NONE		-139,102.
GBG UK TP to GBG Inc.		NONE		288,200.
Totals		98,383.		-93,311.
Sch F, Line 13 - Other assets				
GBG		-4,748,552.		NONE
GBGH		-13,000.		NONE
GBE		-149,985.		NONE
GIL		-1,377,394.		NONE
Due from GBG - Admin Fee		6,477,798.		NONE
Totals		188,867.		NONE
Sch F, Line 16 - Other current liabilities				
Accrued Expenses		328,981.		72,811.
Accrued Payroll		139,102.		NONE
Deferred Taxes Payable		-28,072.		NONE
TAXES		108,244.		164,084.
Credit Card		NONE		41,358.
Lease Liability		NONE		863,943.
Totals		548,255.		1,142,196.

Form 5471, Page 3 Detail

	Func Currency	US Currency
	-----	-----
Sch C, Line 16 - Taxes		

Payroll Tax Expense	654,868.	32,793.
	-----	-----
Total	654,868.	32,793.
	=====	=====

Sch C, Line 17 - Other Deductions

Consulting	10,295,712.	515,562.
Fringe	180,106.	9,019.
Bank Charges	37,078.	1,857.
Meals for Staff	402.	20.
Miscellaneous	105,330.	5,274.
	-----	-----
Total	10,618,628.	531,732.
	=====	=====

Sch C, Line 21a - Income tax expense (benefit) - current

Mexico	3,573,767.	178,958.
	-----	-----
Total	3,573,767.	178,958.
	=====	=====

GBG ELITE MEDICAL SERVICES, S.A. DE C.V. (MEXICO)

Form 5471, Page 4 Detail

=====				
	Beginning		Ending	
	Func	Currency	Func	Currency
	-----	-----	-----	-----
Sch F, Line 13 - Other assets				

GBG		7,221,295.		NONE
GBG Premier		268,239.		273,740.
Due From GBG/Gil Other		-25,248.		NONE
GIL		-2,000.		-3,207,786.
	-----	-----	-----	-----
Totals		7,462,286.		-2,934,046.
	=====	=====	=====	=====
Sch F, Line 16 - Other current liabilities				

Paid Claims		9,914,589.		NONE
Foreign Income Tax Payable		NONE		-299,864.
Unearned Income		NONE		1,008,947.
	-----	-----	-----	-----
Totals		9,914,589.		709,083.
	=====	=====	=====	=====

Form 5471, Page 3 Detail

	Func Currency	US Currency
Sch C, Line 17 - Other Deductions		
Bank Charges	249,596.	12,499.
Miscellaneous	-489.	-24.
Total	249,107.	12,475.

GBG PREMIER, S.A.DE.C.V (MEXICO)

Form 5471, Page 4 Detail

		Beginning		Ending	
		Func Currency	US Currency	Func Currency	US Currency
Sch F, Line 13 - Other assets					

GBG			-347,433.		-351,087.
GBG Elite			-268,239.		-273,695.
GIL			-3,600.		2.
Totals			-619,272.		-624,780.
		=====	=====	=====	=====
Sch F, Line 16 - Other current liabilities					

Broker Comm Payable 2019			-125,534.		NONE
Unearned Income			NONE		91,723.
Totals			-125,534.		91,723.
		=====	=====	=====	=====

Form 5472, Page 1 Detail

=====

The following US affiliated group members are electing to file a consolidated Form 5472 - "Information return of a 25% foreign-owned US corporation or a foreign corporation engaged in a US trade or business."

Related Party GBG Insurance Limited
ID Number: FOREIGNUS

GLOBAL BENEFITS GROUP, INC.
FEIN: 20-3842750
27422 Portola Pkwy #110
Foothill Ranch, CA 92610

International Claims Services, Inc.
98-0076650
27422 PORTOLA PARKWAY - SUITE 110, Foothill Ranch, CA 92610

GBG HOLDINGS, INC.
33-0950280
27422 PORTOLA PARKWAY - SUITE 110, Foothill Ranch, CA 92610

Form 5472 - Information Return of a Foreign Owned Corporation
=====

Part IV - Other Amounts Paid	

Administration Expenses	5,141,433.

Total	5,141,433.
	=====

Part IV - Exchange Rate Schedule	

USD	1.0000000

Form 5472, Page 1 Detail

=====

The following US affiliated group members are electing to file a consolidated Form 5472 - "Information return of a 25% foreign-owned US corporation or a foreign corporation engaged in a US trade or business."

Related Party Global Benefits Europe B.V.
ID Number: FOREIGNUS

GLOBAL BEEFITS GROUP, INC
FEIN: 20-3842750
27422 Portola Pkwy #110
Foothill Ranch, CA 92610

International Claims Services, Inc.
98-0076650
27051 Towne Centre Drive, #210, Foothill Ranch, CA 92610

GBG HOLDINGS, INC.
33-0950280
27051 Towne Centre Drive, #210, Foothill Ranch, CA 92610

GBG Assist, Inc.
37-1797452
27051 Towne Centre Drive, #210, Foothill Ranch, CA 92610

Form 5472 - Information Return of a Foreign Owned Corporation
=====

Part IV - Exchange Rate Schedule

USD	1.0000000
-----	-----------

Form 5472, Page 1 Detail

=====

The following US affiliated group members are electing to file a consolidated Form 5472 - "Information return of a 25% foreign-owned US corporation or a foreign corporation engaged in a US trade or business."

Related Party GBGI Limited
ID Number: FOREIGNUS

Global Benefits Group Inc
FEIN: 20-3842750
27051 Towne Centre Drive, #210
FOOTHILL RANCH, CA 92610

GBG Assist, Inc.
37-1797452
27051 Towne Centre Drive, #210, Foothill Ranch, CA 92610

Global Benefits Group Inc
20--384275
27051 Towne Centre Drive, #210, FOOTHILL RANCH,, CA 92610

Form 5472 - Information Return of a Foreign Owned Corporation
=====

Part IV - Other Amounts Paid	

Administration Expenses	856,906.

Total	856,906.
	=====

Part IV - Exchange Rate Schedule	

USD	1.0000000

Form 8992 - Schedule B Calculation of GILTI for Members of a
=====

U.S Consolidated Group Who Are U.S. Shareholders of a CFC

Part I - Reference ID Number

SHANGHAI(GBG) ENTERPRISE MANAGEMENT CONSULTIN

3007707

GBG SERVICES (INDIA) PRIVATE LIMITED

541990

GLOBAL BENEFITS GROUP CANADA LTD.

00005

GLOBAL BENEFITS GROUP PROCESSING PHILIPPINES

881804

GLOBAL BENEFITS GROUP (UK) LIMITED

00001

GBG ELITE MEDICAL SERVICES, S.A. DE C.V. (MEX

00002

GBG PREMIER, S.A.DE.C.V (MEXICO)

00003

GBG PARAGUAY SOCIEDAD ANONIMA

00006

Form 8916-A, Part III Detail
=====

Line 4 - Other Interest Expense

Description	Per Income Stmt	Temporary Difference	Permanent Difference	Per Tax Return

GBG Assist, Inc.				

Interest Expense	180,082.			180,082.
	-----	-----	-----	-----
Subtotal	180,082.			180,082.
	-----	-----	-----	-----
Total	180,082.			180,082.
	=====	=====	=====	=====

**Section 1.263(a)-3(n) Election to
Capitalize Repair and Maintenance Costs**

Taxpayer: Global Benefits Group, Inc. & Subsidiaries

Address:

27051 Towne Centre Drive, #210
Foothill Ranch, CA 92610

Tax Identification Number: 20-3842750

Year: 2022

Subsidiaries:

Global Benefits Group, Inc.
GBG Administrative Services, Inc.
GBG Assist, Inc.
International Claims Services, Inc.
GBG Insurance Services, Inc
GBG Holdings, Inc.
Global Benefits Group, U.S. Inc.

FEIN

20-3842750
26-4068764
37-1797452
98-0076650
27-0167612
33-0950280
20-4570749

Global Benefits Group, Inc. & Subsidiaries are making the election to capitalize repair and maintenance costs under Treas. Reg. §1.263(a)-3(n) of the Final Repair Regulations (T.D. 9636) for the taxable year that began 01/01/2022 and ended 12/31/2022.

Global Benefits Group, Inc. is making this election for itself, and for each of its subsidiaries listed above.

Section 1.263(a)-1(f) De Minimis Safe Harbor Election

Taxpayer: Global Benefits Group, Inc. & Subsidiaries

Address:

27051 Towne Centre Drive, #210
Foothill Ranch, CA 92610

Tax Identification Number: 20-3842750

Year: 2022

Subsidiaries:

Global Benefits Group, Inc.
GBG Administrative Services, Inc.
GBG Assist, Inc.
International Claims Services, Inc.
GBG Insurance Services, Inc.
GBG Holdings, Inc.
Global Benefits Group, U.S. Inc.

FEIN

20-3842750
26-4068764
37-1797452
98-0076650
27-0167612
33-0950280
20-4570749

Global Benefits Group, Inc. & Subsidiaries are making the de minimis safe harbor election under Treas. Reg. §1.263(a)-1(f) of the Final Repair Regulations (T.D. 9636) for the taxable year that began 01/01/2022 and ended 12/31/2022.

Global Benefits Group, Inc. is making this election for itself, and for each of its subsidiaries listed above.